

March 1984



LEEDS & NORTHRUP COMPANY

North Wales, Pennsylvania

Final Closure Plan Sludge Dewatering Beds



Engineers, Planners and Scientists

One Plymouth Meeting • Plymouth Meeting, PA 19462 • Phone: (215) 825-3800

CLOSURE PLAN FOR SLUDGE DEWATERING BEDS

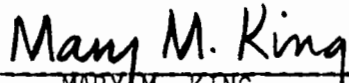
FOR

LEEDS AND NORTHRUP COMPANY
NORTH WALES, PENNSYLVANIA

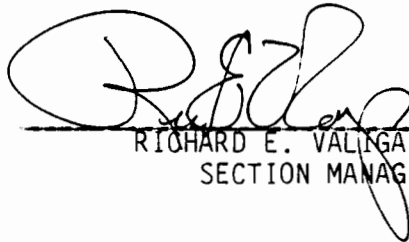
MARCH 19, 1984

BCM PROJECT NO. 00-5293-03

PREPARED BY:

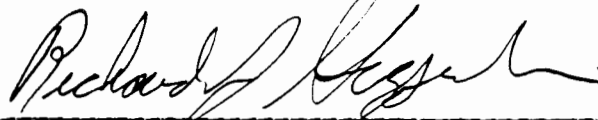


MARY M. KING
PROJECT ENGINEER



RICHARD E. VALIGA, P.E.
SECTION MANAGER

APPROVED BY:



RICHARD J. GRZYWINSKI, P.E.
VICE PRESIDENT

BCM EASTERN INC.
ONE PLYMOUTH MEETING MALL
PLYMOUTH MEETING, PENNSYLVANIA 19462



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Leeds & Northrup Company



1.0 INTRODUCTION

1.1 GENERAL

Leeds and Northrup Company owns and operates the Leeds and Northrup Instruments facility in North Wales, Montgomery County, Pennsylvania (see Figure 1). At the facility, energy and process control instrumentation and digital computer control systems are produced.

As part of the manufacturing processes, Leeds and Northrup utilizes various metal finishing operations. Wastewater from the metal finishing processes is treated at an onsite wastewater treatment operation, and settled solids are piped to three sludge dewatering beds for final dewatering. The settled solids or sludge obtained is subsequently transported offsite for disposal.

Leeds and Northrup filed an interim status notification to the U.S. Environmental Protection Agency (EPA) on July 24, 1981, to operate the sludge dewatering beds as a hazardous waste storage tank facility. The documents associated with this filing are presented in Appendix 1. The sludge wastes dewatered in the sludge beds have been designated as F006 (wastewater treatment sludges from electroplating operations), F007 (spent plating bath solutions from electroplating operations), and F008 (plating bath sludges from the bottom of plating baths from electroplating operations). Wastewater (filtrate) from the dewatering process is discharged into Dadsworth Run, a tributary stream of the Wissahickon Creek (see Appendix 2). The discharge complies with permit approval from the National Pollutant Discharge Elimination System (NPDES).

Subsequent to the Part A interim status notification, the Pennsylvania Department of Environmental Resources (PADER) requested that Leeds & Northrup file a Part B permit application for continued operation of the sludge dewatering beds, in a letter dated March 7, 1983 (see Appendix 3). Leeds and Northrup has reviewed the requirements to permit the facilities under Part B, and as a result of assessing the treatment alternatives to the existing operation, has decided to close this facility under its present interim status standing. Notification to the PADER of Leeds and Northrup's intent to close the facility is presented in Appendix 4. In summary, Leeds and Northrup's proposed program for closure consists of replacement of the sludge dewatering beds with a sludge thickening tank and vacuum filter press system. The dewatered sludge will be transferred to 55-gallon drums and ultimately transported offsite for final disposal. At no time will the onsite storage of the sludge-containing drums exceed 90 days. Thus, there will be no requirement for Leeds and Northrup to obtain a Part B permit for the sludge dewatering beds or drum storage area. This final closure plan sets forth the overall program, schedule, and costs for the sludge dewatering beds closure program.

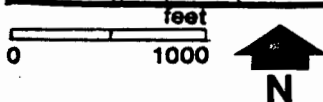
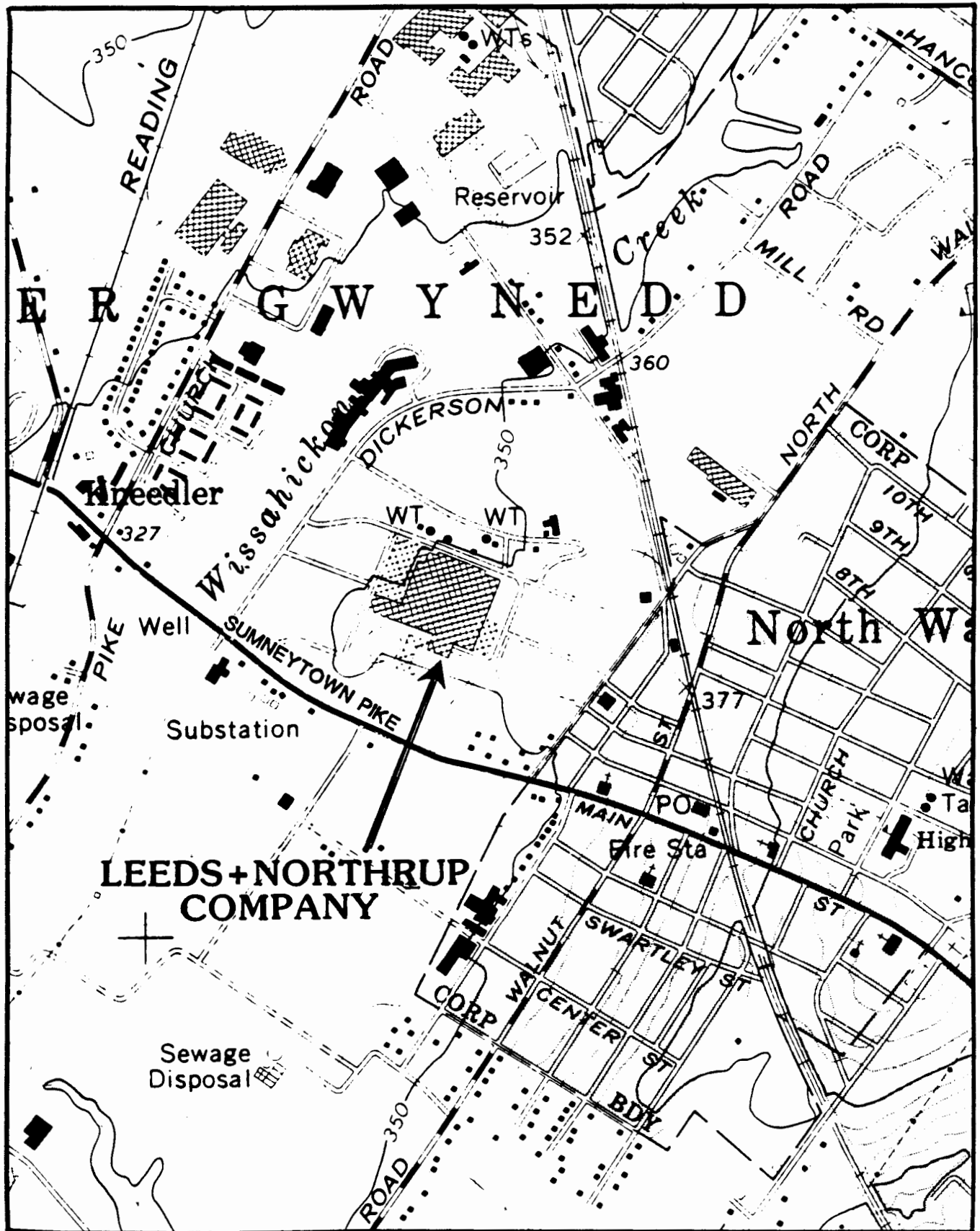
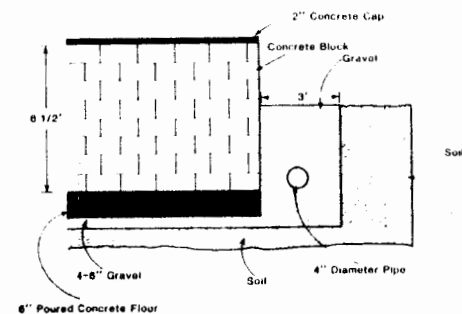
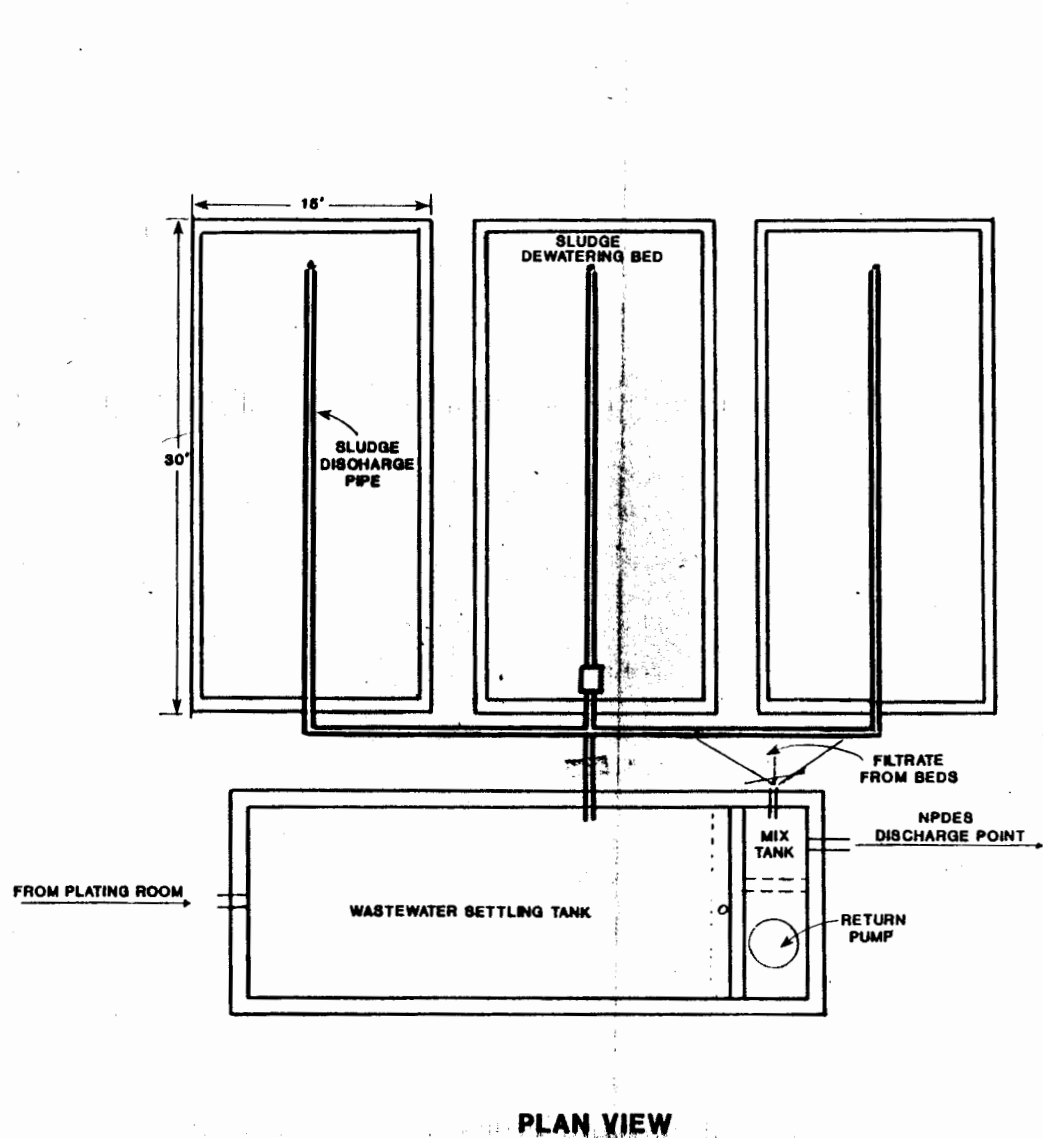


Figure 1
LOCATION PLAN
2 LEEDS + NORTHRUP COMPANY
North Wales, PA

1.2 REGULATORY REQUIREMENTS

Section 75.265 of the PADER Hazardous Waste Regulations "Interim Status for Hazardous Waste Management Facilities and Permit Program for New and Existing Hazardous Waste Management Facilities," establishes minimum standards which must be met when hazardous waste facilities under interim status are closed. General closure and postclosure requirements are contained in Subsection 75.265(o); closure standards specific to tanks are contained in Subsection 75.265(r). As detailed in Figure 2, the three sludge dewatering beds are defined by PADER as tanks, as noted on Leeds and Northrup Company's Part A Permit Application.

Leeds and Northrup anticipates that actual use of the dewatering beds will cease on or around May 31, 1984, thus, this closure plan is submitted only 90 days prior to the final waste receiving date (Subsection 75.265(o)(5)). However, if PADER approval of the plan is received by May 31, 1984, all sludge within the facility will be removed within 90 days (Subsection 75.265(o)(f)), and completion of all closure activities will occur within 180 days after receiving the final volume of waste (Subsection 75.265(o)(i)). Further discussion on the closure schedule is contained in Section 3.0.



SECTION VIEW



NOT DRAWN TO SCALE

Figure 2
**DETAIL OF
 SLUDGE
 DEWATERING BEDS**
 LEEDS+NORTHROP COMPANY
 North Wales, PA

2.0 CLOSURE OF THE SLUDGE DEWATERING BEDS

2.1 DESCRIPTION OF FACILITY

The Leeds and Northrup facility consists of approximately 160 acres, most of which is manufacturing or office buildings, paved parking areas, and open space. The main manufacturing building is located centrally within the defined property limits, and the three (3) sludge dewatering beds are located immediately northeast of the manufacturing building (see Figure 3).

As detailed in Figure 2, each of the three sludge beds has a surface area of 450 square feet (15 feet x 30 feet) and a depth of 6.6 feet. The resulting total volume capacity for all three sludge beds is 66,000 gallons; Leeds and Northrup, however, only utilizes about one-third of the total volume capacity of each bed at any given time. The sludge beds are constructed of permeable concrete block. Two of the three beds have floors constructed of poured concrete with an epoxy-coated type surface. The floor of the third bed is constructed only of poured concrete. Filtrate from the sludge passes through the concrete block walls and is collected by a French drain. From the French drain, the filtrate is piped to a mix tank located at the end of the sedimentation tank before being discharged into Dadsworth Run.

2.2 WASTE CHARACTERIZATION

The Leeds and Northrup plant manufactures chart paper, recorders, transducers, transmitters, controllers, and various types of display instrumentation. Inherent in the manufacture of these items are several industrial processes including machining, tooling, painting, electroplating, and various other metal finishing operations.

Presently, all electroplating and metal finishing is done using nickel, chromate, gold, and zinc as the metal components. Chemical rinses that wash off dragout film from the electroplating process on the individual components are recirculated within four separate closed loop systems for periods of up to 4 months prior to treatment and discharge.

The spent rinses are piped into one of two connected mixing tanks for neutralization. Soda ash or caustic soda are used as the neutralizing agents. Lime quantity used is determined by an attainment of pH equal to 7. The neutralized wastewater then flows to a gravity-settling tank for sedimentation (see Figure 2). The clarified wastewater subsequently flows into a mix tank, along with filtrate from the three sludge dewatering beds, before being discharged under an NPDES permit into Dadsworth Run.

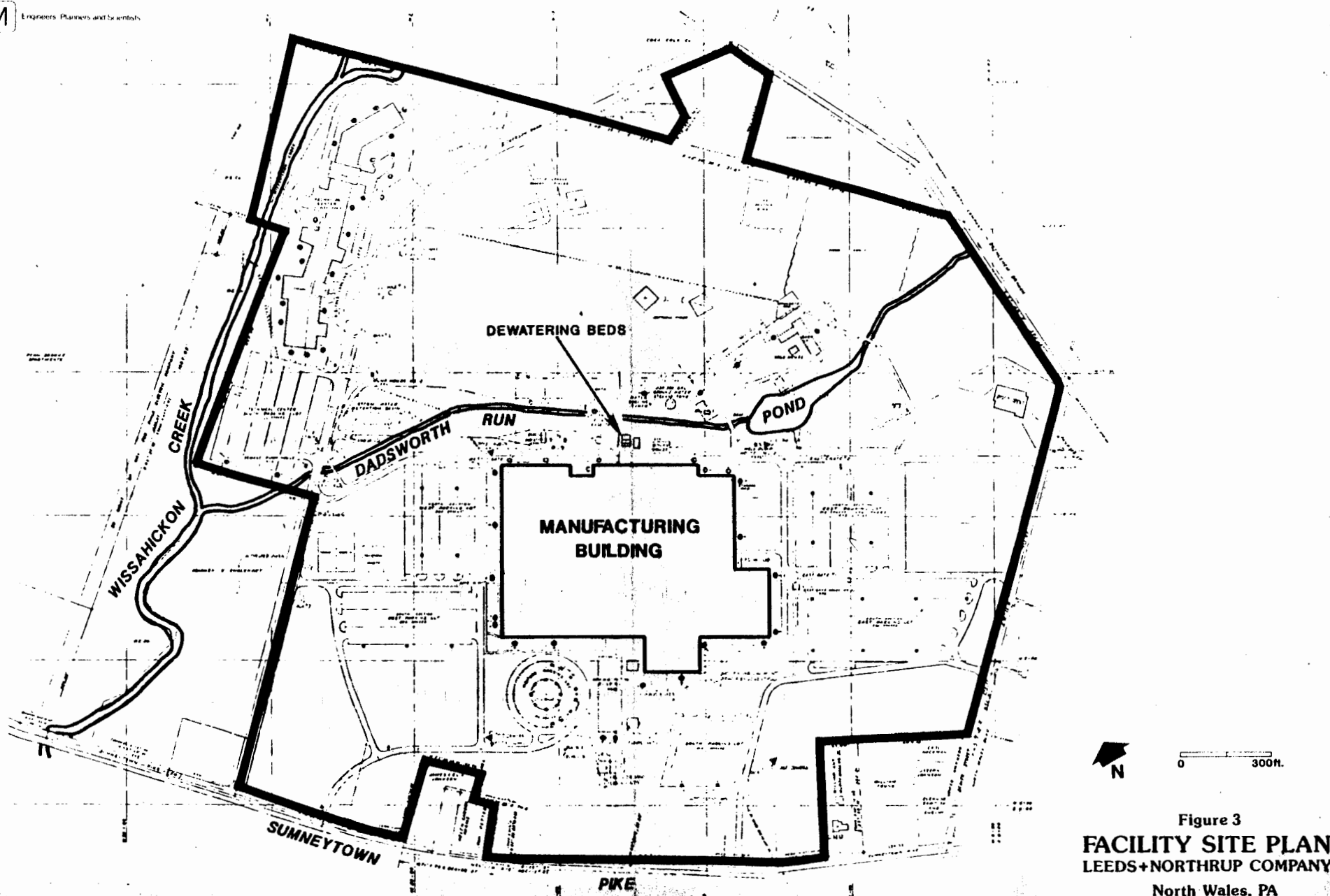


Figure 3
FACILITY SITE PLAN
LEEDS+NORTHROP COMPANY
North Wales, PA

Sludge from the settling tank is transferred via pumping to one or more of the three dewatering beds. Following dewatering, the sludge is removed by a licensed EPA waste hauler, and is ultimately disposed of at a permitted TSD facility.

The sludge produced as a result of the plating process is defined as a hazardous waste under regulations of the Resource Conservation Recovery Act (RCRA). The EPA Hazardous Waste designation number is F006.

2.3 CLOSURE PROGRAM

2.3.1 Sludge Thickening/Dewatering System

Upon approval of the proposed plan by PADER, physical closure of the sludge dewatering beds will commence. However, prior to commencement, the sludge treatment process will be upgraded to a more sophisticated system. Settled material recovered from the existing sedimentation tank will be transferred to a metal sludge thickening tank and periodically withdrawn to a vacuum filter press for dewatering. The dewatered sludge cake will then be placed in 55-gallon containers approved by the EPA and Department of Transportation (DOT) for transport and final disposal at a hazardous waste landfill. At no time will drum storage exceed 90 days. The recovered filtrate will be rerouted to the wastewater settling tank for final discharge.

Following the startup of the filter press dewatering system and the closure of the surface impoundments, Leeds & Northrup will submit necessary documentation for the modification of the following permits: (1) EPA Hazardous Waste (Part A), and (2) NPDES. Approval of the permit modifications will allow Leeds & Northrup to apply for an exemption from PADER hazardous waste treatment, storage and disposal regulations. Leeds & Northrup will become, by definition, only a generator of hazardous wastes.

2.3.2 Site Evaluation

A soil sampling program conducted in August 1983, investigated soil conditions immediately adjacent to the three sludge dewatering beds (see Appendix 5). Four (4) individual soil borings were collected, composited and analyzed for volatile organic compounds (halocarbons and aromatics). In addition, a leachate was prepared from the composited soil sample according to the EPA Extraction Procedure. The leachate was then analyzed for various heavy metals, including nickel, chromium, and zinc. Results of the analytical testing are summarized in Table 1. The results obtained from the analyses indicated that no concentrations of any of the tested parameters exceeded RCRA hazardous waste classification criteria.

TABLE 1
ANALYTICAL RESULTS
SOIL SAMPLING PROGRAM
(AUGUST 19, 1983)

Parameter	Units	Concentration	RCRA Hazardous Waste Leachate Classification Criteria (mg/l)
<u>METALS*</u>			
Silver	mg/l	<0.02	5.0
Arsenic	mg/l	0.129	5.0
Barium	mg/l	<.40	100.0
Cadmium	mg/l	<0.01	1.0
Chromium	mg/l	0.73	5.0
Copper	mg/l	0.28	--
Iron	mg/l	225	--
Lead	mg/l	0.38	5.0
Mercury	mg/l	0.0003	0.2
Nickel	mg/l	0.14	--
Selenium	mg/l	<0.001	1.0
Zinc	mg/l	0.55	--
<u>PURGEABLE HALOCARBONS**</u>			
Chloromethane	mg/kg	<0.1	
Bromomethane	mg/kg	<0.1	
Vinyl Chloride	mg/kg	<0.1	
Chloroethane	mg/kg	<0.1	
Methylene Chloride	mg/kg	<0.1	
Trichlorofluoromethane	mg/kg	<0.1	
1,1-Dichloroethene	mg/kg	<0.1	
1,1-Dichloroethane	mg/kg	<0.1	
Trans-1,2-Dichloroethene	mg/kg	<0.1	
Chloroform	mg/kg	<0.1	

TABLE 1 (Continued)

Parameter	Units	Concentration
1,2-Dichloroethane	mg/kg	<0.1
1,1,1-Trichloroethane	mg/kg	<0.1
Carbon Tetrachloride	mg/kg	<0.1
Bromodichloromethane	mg/kg	<0.1
1,2-Dichloropropene	mg/kg	<0.1
Trans-1,3-Dichloropropene	mg/kg	<0.1
Trichloroethene	mg/kg	<0.1
Dibromochloromethane	mg/kg	<0.1
1,1,2-Trichloroethane	mg/kg	<0.1
Cis-1,3-Dichloropropene	mg/kg	<0.1
Bromoform	mg/kg	<0.1
1,1,2,2-Tetrachloroethane	mg/kg	<0.1
Tetrachloroethene	mg/kg	<0.1
Chlorobenzene	mg/kg	<0.1
1,3-Dichlorobenzene	mg/kg	<0.1
1,2-Dichlorobenzene	mg/kg	<0.1
1,4-Dichlorobenzene	mg/kg	<0.1
<u>PURGEABLE AROMATICS**</u>		
Benzene	mg/kg	<0.1
Toluene	mg/kg	<0.1
Chlorobenzene	mg/kg	<0.1
Ethyl Benzene	mg/kg	<0.1
1,3-Dichlorobenzene	mg/kg	<0.1
1,4-Dichlorobenzene	mg/kg	<0.1
1,2-Dichlorobenzene	mg/kg	<0.1

* Metals analysis conducted on leachate prepared according to EPA Extraction Procedure

** Purgeable halocarbon and aromatic concentrations determined through GC analysis.

2.3.3 Waste Excavation and Sampling Program

At this time, only one of the three dewatering beds contains sludge. This sludge will be removed and transported offsite for disposal in a hazardous waste landfill by ENVIRITE, INCORPORATED, who presently handle all of Leeds & Northrup's hazardous wastes.

The two remaining sludge dewatering beds contain no substantial quantities of sludge; however, some sludge material has adhered to the floor and sidewalls of the beds. In order to remove this material, the floors and sidewalls will be scraped to remove any surface material. Any removed sludge material will be disposed of in an approved landfill by ENVIRITE, INC. or another authorized waste hauler. Any surface water (i.e., rain-water) or wastewater will be pumped from the beds into the wastewater settling tank for solids removal prior to discharge into Dadsworth Run.

Leeds and Northrup proposes to collect the following soil and/or concrete samples following the removal of any sludge material and/or wastewater and before the commencement of any excavation. One representative core sample will be collected from the bed liner composed of concrete and measuring approximately 6 inches in thickness in each of the dewatering facilities. In addition, one core sample (9 to 12 inches) will be collected from the soil underlying each bed, and a composite sample for each bed will be made from representative concrete block samples (one sample per impoundment wall) collected within each impoundment. Finally, four individual core samples will be collected from the soil and gravel which compose the French drain system located adjacent to the dewatering beds. Thus, a total of 13 soil and concrete block samples will be collected, or approximately four samples per impoundment. The 13 samples will be subjected to the Toxic Extraction Procedure (TEP), and the leachates will be analyzed for chromium. Analytical results will be evaluated statistically, according to "Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods" (EPA Publication SW-846), to determine that adequate samples have been collected and analyzed. At least three additional samples of soil or soil/gravel will be collected, but these will not be analyzed unless the statistical evaluation procedures in SW-846 indicate that such analysis is required.

Should this analytical methodology confirm that the material sampled is not a hazardous waste (according to the criteria of EP toxicity), closure of the dewatering beds will proceed as described in the following paragraphs. However, if either the concrete wall or floor, or the soil beneath the dewatering beds or the French drain system, are classified as a hazardous waste by the EP toxicity criteria, the resulting materials will be removed and disposed of as a hazardous waste at an authorized facility. Another similar sampling and analysis program will then be performed on the exposed material after excavation and/or removal. Based upon the analytical results obtained from previously collected soil samples (see Section 2.3.2), Leeds and Northrup anticipate that the dewatering bed liner materials and soil beneath each bed will not be classified as a hazardous waste.

2.3.4 Dewatering Bed Dismantlement

The beds will be dismantled upon the determination that the dewatering bed liners (floors and walls) and underlying soil are not hazardous. All concrete blocks making up the bed sidewalls which extend above the surrounding grade will be removed and disposed of, either offsite or by placement within the remaining bed structures. Any additional blocks needed to be removed for final grading purposes will be removed and disposed of in the above manner.

2.3.5 Equipment and Structure Decontamination

When physical closure of the dewatering beds is completed, all facility equipment and structures, and equipment used in the physical closure of the facility, will be properly disposed of or decontaminated in accordance with the requirements set forth in subsection 75.265(o) of the PADER hazardous waste regulations. Any hazardous waste residue collected during the decontamination procedure will be disposed of in an approved landfill.

2.3.6 Site Regrading

After all equipment and structures have been decontaminated, the area will be filled to grade with clean fill material. It is anticipated that the required amount of fill material will be obtained from an offsite source. The impoundment area will then be contoured to reflect the surrounding grade. Vegetation common to the area, such as perennial rye grass, will then be planted to minimize erosion and control surface runoff.

2.4 POST-CLOSURE PROGRAM

As defined under Subsection 75.265 (r)(9), all hazardous waste and hazardous waste residues must be removed at closure. Therefore, no postclosure monitoring will be required.



3.0 CLOSURE SCHEDULE AND COSTS

3.1 CLOSURE SCHEDULE

Closure of the three dewatering beds will commence with the startup of the vacuum filter dewatering facility on or about May 31, 1984. It is anticipated that all sludge removal and disposal will be completed within 90 days of closure commencement and all closure activities within 180 days; thus it is anticipated that closure will be completed by November 30, 1984. Upon completion of the closure activities, both Leeds and Northrup and an independent, registered professional engineer will prepare and submit certificates of facility closure. Table 2 presents a projected closure schedule.

3.2 CLOSURE COSTS

Estimated costs for closure of the dewatering beds are given in Table 2. The estimated cost for closure is \$98,000.



TABLE 2
SUMMARY OF CLOSURE SCHEDULE AND ESTIMATED COSTS

Closure Activity	Estimated Completion Date	Cost Estimate
1. Submit closure plan to PADER	3/15/84	\$ 5,500
2. PADER approval and/or modification of plan	5/15/84	---
3. Resubmit plan to PADER, if necessary	---	---
4. Remove and treat all impoundment sludge and dispose of at an approved facility	6/15/84	\$ 9,000
5. Conduct pre-excavation sampling and analysis	6/29/84	\$ 2,500
6. Excavate and remove contaminated material and/or soil, resample, if necessary	8/15/85	\$75,500
7. Backfill dewatering beds to final graded elevation	9/15/84	\$ 3,000
8. Revegetate the area	9/30/84	\$ 500
9. Submit certification of closure to PADER	11/30/84	<u>\$ 2,000</u>
TOTAL ESTIMATED COST		\$98,000



APPENDIX 1
PART A PERMIT APPLICATION

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F P A D 0 0 2 2 7 7 9 5 2	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
PA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
II. FACILITY NAME					
FACILITY MAILING ADDRESS					
FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS					
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.					
SPECIFIC QUESTIONS		MARK "X"		SPECIFIC QUESTIONS	
		YES	NO	FORM ATTACHED	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)			X		
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	*		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)			X		
Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			X		
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			X		
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)			X		
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)			X		
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		

NAME OF FACILITY	
LEEDS & NORTHRUP COMPANY	

IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	
SAGE RITA IND HYGIENIST	
B. PHONE (area code & no.)	
215 643 2000	

V. FACILITY MAILING ADDRESS	
A. STREET OR P.O. BOX	
SUMNEYTOWN PIKE	
B. CITY OR TOWN	
NORTH WALES	
C. STATE	D. ZIP CODE
PA	19454

VI. FACILITY LOCATION	
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
SUMNEYTOWN PIKE	
B. COUNTY NAME	
MONTGOMERY	
C. CITY OR TOWN	
NORTH WALES	
D. STATE	E. ZIP CODE
PA	19454
F. COUNTY CODE (if known)	

t, in order of priority)

A. FIRST

B. SECOND

(specify)

Industrial Instruments

(specify)

Totalizing Fluid

C. THIRD

D. FOURTH

(specify)

Semi-Conductors

(specify)

Electronic Computing Equipment

OR INFORMATION

A. NAME

B. Is the name listed in Item VIII-A also the owner?

☒ YES ☐ NO

E.E.D.S. & NORTHRUP COMPANY

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

D. PHONE (area code & no.)

FEDERAL M = PUBLIC (other than federal or state)
STATE O = OTHER (specify)
PRIVATE

P (specify)

2 1 5 6 4 3 2 0 0 0

E. STREET OR P.O. BOX

INEY TOWN PIKE

F. CITY OR TOWN

G. STATE

H. ZIP CODE

IX. INDIAN LAND

Is the facility located on Indian lands?

☐ YES ☒ NO

ORTH WALES

P A

1 9 4 5 4

ENVIRONMENTAL PERMITS

NPDES (Discharges to Surface Water)

D. PSD (Air Emissions from Proposed Sources)

1 1 3 3 9

9 P

U. (Underground Injection of Fluids)

E. OTHER (specify)

9

(specify)

RCRA (Hazardous Wastes)

E. OTHER (specify)

9

(specify)

This application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

E.E.D.S. & Northrup is a manufacturer of Energy and Process Control Instrumentation and Digital Computer Control Systems. L&N manufactures transmitters, transducers, controllers, and various types of display instrumentation.

VERIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all its contents and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. OFFICIAL TITLE (type or print)

B. SIGNATURE

C. DATE SIGNED

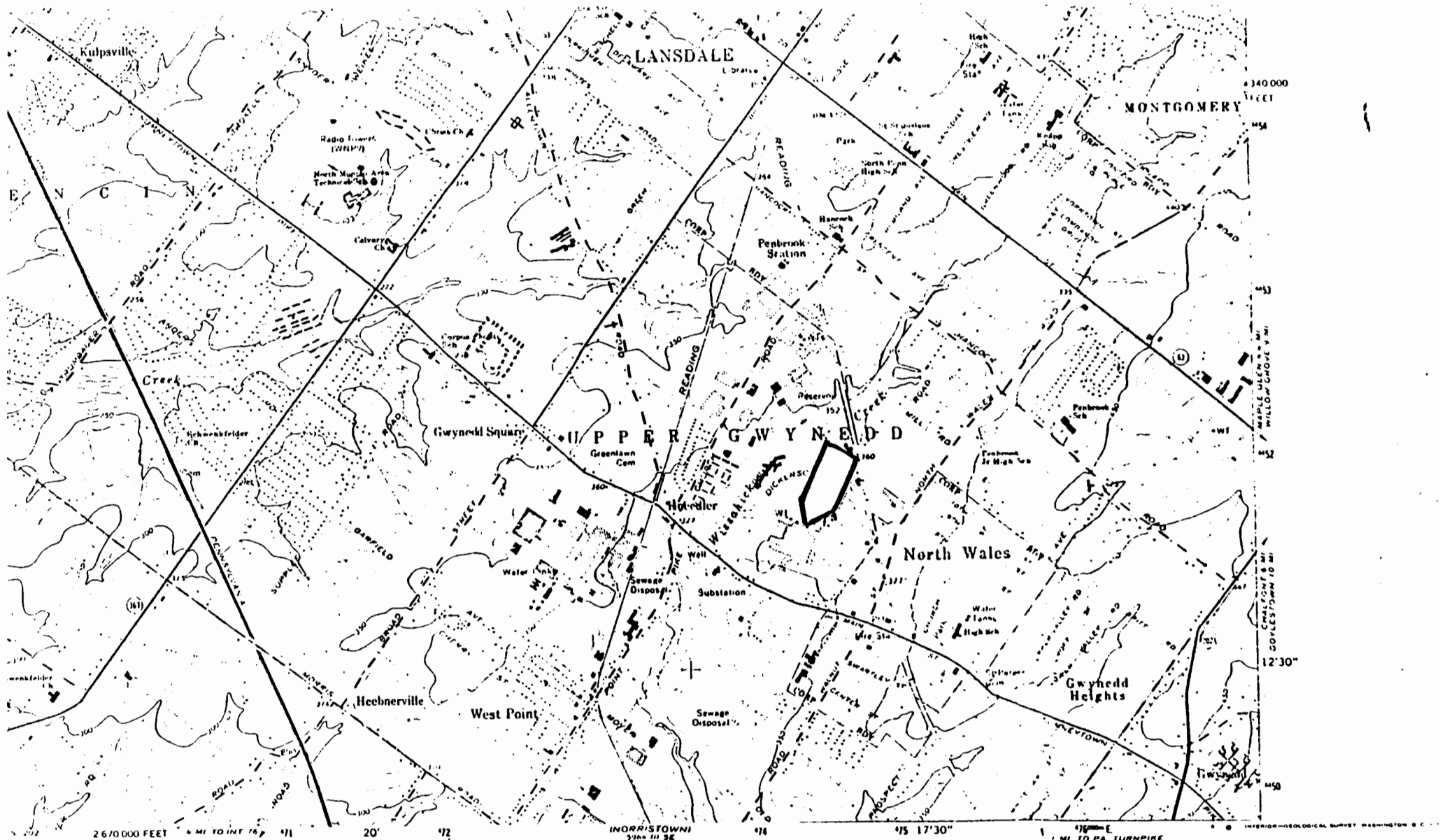
I Eisenhardt
President, Instruments Unit

[Signature]

1/1/72

INTENT FOR OFFICIAL USE ONLY

*Leeds & Northrup Company is currently applying for renewal of our NPDES permit,
and so Form 2C has not been attached.



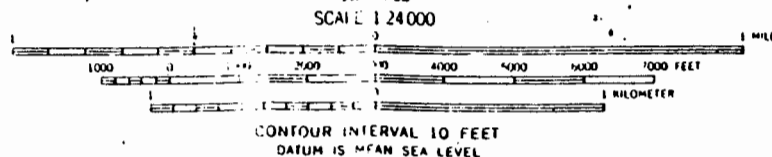
U.S. Geological Survey
Department of Internal
Survey

Map compiled from aerial
photographs taken from aerial
1965

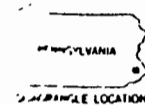
North American datum
coordinate system, south zone
or grid ticks, zone 18.

Boundaries and field lines where
This information is unchecked
and mark buildings are shown

UTM GRID AND 1973 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET



LANSDALE QUADRANGLE
PENNSYLVANIA-MONTGOMERY CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)



LANSDALE

N40075-W75

1966

AMS 5084 III NE-50

THIS MAP COMPLETES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions: 1. Purple compiled from aerial photographs
taken 1965. Information not field checked.
Purple 2. Shows extension of urban areas.

FORM 3 RCRA	 EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program <i>(This information is required under Section 3005 of RCRA.)</i>	I. EPA I.D. NUMBER <table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width:10%;">F</td><td style="width:10%;">P</td><td style="width:10%;">A</td><td style="width:10%;">D</td><td style="width:10%;">0</td><td style="width:10%;">0</td><td style="width:10%;">2</td><td style="width:10%;">2</td><td style="width:10%;">7</td><td style="width:10%;">7</td><td style="width:10%;">9</td><td style="width:10%;">5</td><td style="width:10%;">2</td><td style="width:10%;">1</td> </tr> </table>	F	P	A	D	0	0	2	2	7	7	9	5	2	1
F	P	A	D	0	0	2	2	7	7	9	5	2	1				

FOR OFFICIAL USE ONLY

APPLICATION APPROVED <table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width:10%;">1</td><td style="width:10%;">2</td><td style="width:10%;">3</td><td style="width:10%;">4</td><td style="width:10%;">5</td><td style="width:10%;">6</td><td style="width:10%;">7</td><td style="width:10%;">8</td><td style="width:10%;">9</td><td style="width:10%;">0</td> </tr> </table>	1	2	3	4	5	6	7	8	9	0	DATE RECEIVED (yr., mo., & day) <table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width:10%;">1</td><td style="width:10%;">2</td><td style="width:10%;">3</td><td style="width:10%;">4</td><td style="width:10%;">5</td><td style="width:10%;">6</td><td style="width:10%;">7</td><td style="width:10%;">8</td><td style="width:10%;">9</td><td style="width:10%;">0</td> </tr> </table>	1	2	3	4	5	6	7	8	9	0	COMMENTS <div style="height: 40px;"></div>
1	2	3	4	5	6	7	8	9	0													
1	2	3	4	5	6	7	8	9	0													

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date) <input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) <table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width:10%;">YR.</td><td style="width:10%;">MO.</td><td style="width:10%;">DAY</td> </tr> <tr> <td>8</td><td>6</td><td>7</td> </tr> </table> FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)	YR.	MO.	DAY	8	6	7	<input type="checkbox"/> 2. NEW FACILITY (Complete item below.) FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN <table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width:10%;">YR.</td><td style="width:10%;">MO.</td><td style="width:10%;">DAY</td> </tr> <tr> <td> </td><td> </td><td> </td> </tr> </table>	YR.	MO.	DAY			
YR.	MO.	DAY											
8	6	7											
YR.	MO.	DAY											
B. REVISED APPLICATION (place an "X" below and complete item I above) <input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS													
<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT													

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS			
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
YARDS	L	TONS PER HOUR	D	HECTARE-METER	H
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	S
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

<div style="display: flex; justify-content: space-between;"> DUP T/A/C 1 </div>									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	18,000			7				
2	S 0 2	30,000			8				
3	T 0 1	1,500*			9				
4					10				

Continued from the front.

PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

*Tank emptied approximately two times per week.

IV. DESCRIPTION OF HAZARDOUS WASTES

HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

SAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
3	D 0 0 1	100	P	T 0 3 D 8 0	
4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																					
<div> <div>W</div> <div>P</div> <div>A</div> <div>D</div> <div>0</div> <div>0</div> <div>2</div> <div>2</div> <div>7</div> <div>7</div> <div>9</div> <div>5</div> <div>2</div> <div>T/A</div> <div>C</div> </div>													<div> <div>W</div> <div>DUP</div> <div>T/A</div> <div>C</div> <div>2</div> <div>DUP</div> </div>																					
DESCRIPTION OF HAZARDOUS WASTES (continued)																																		
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																											
							1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30					
1	F	0	0	1	8,500	P	S	0	1																									
2	F	0	0	2																														
3	U	2	2	6																														
4	D	0	0	1																														
5	F	0	0	3	1,000	P	S	0	1																									
6	D	0	0	1																														
7	U	0	0	2																														
8	F	0	0	5	2,000	P	S	0	1																									
9	D	0	0	1																														
10	F	0	0	6	50,000	P	S	0	2	T	0	1																						
11	D	0	0	0																														
12	F	0	0	7																														
13	F	0	0	8																														
14	F	0	0	9	4,000	P	S	0	1																									
15	F	0	1	7	50,000	P	S	0	1																									
16	U	2	2	0																														
17	D	0	0	1																														
18	U	2	1	1	3,000	P	S	0	1																									
19	D	0	0	2	5	P	S	0	1																									
20																																		
21																																		
22																																		
23																																		
24																																		
25																																		
26																																		

DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

P A D 0 0 2 2 7 7 9 5 2 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

I. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

40 13 00

75 17 30

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

R. D. Eisenhardt
President, Instruments Unit

B. SIGNATURE

R. D. Eisenhardt

C. DATE SIGNED

4/24/81

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

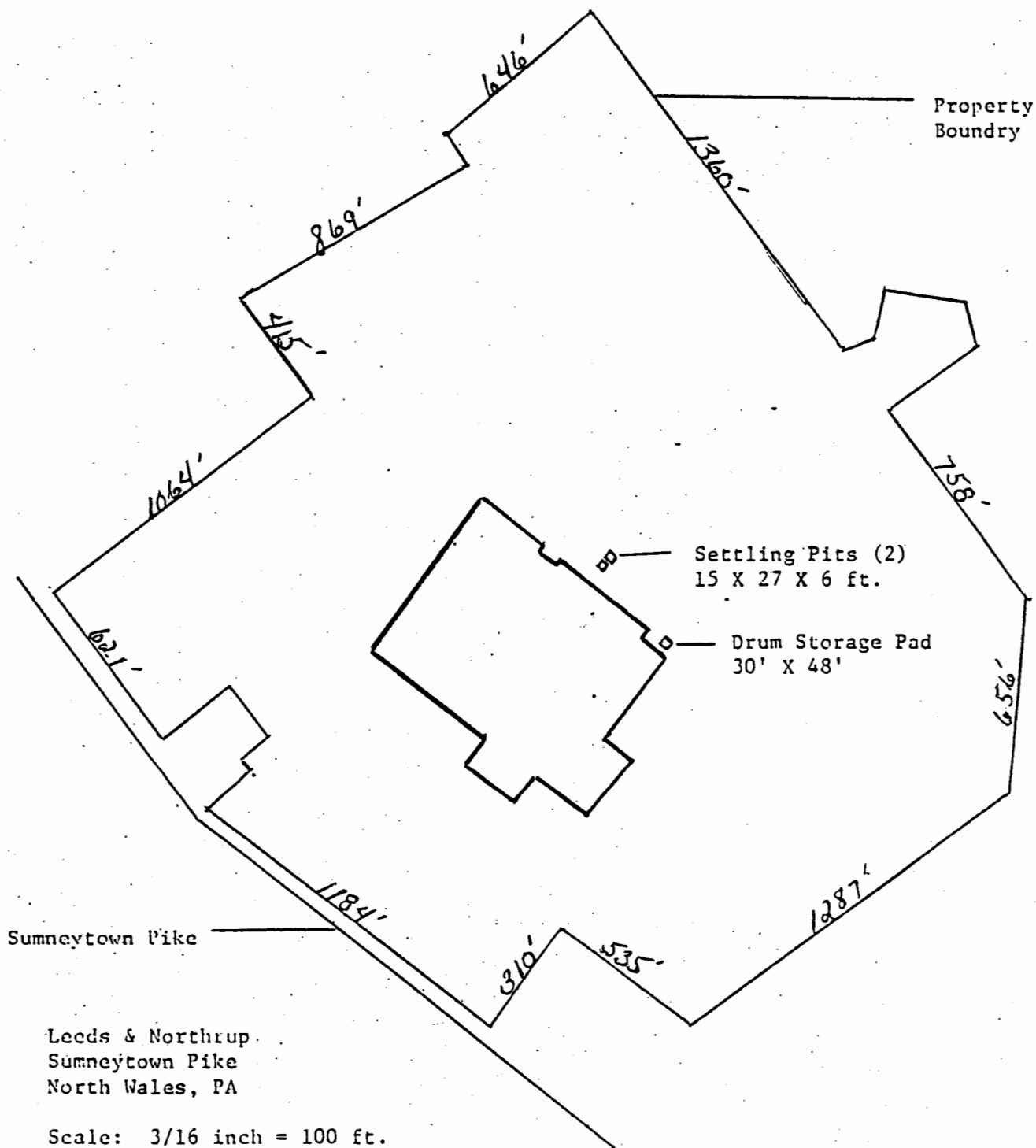
R. D. Eisenhardt
President, Instruments Unit

B. SIGNATURE

R. D. Eisenhardt

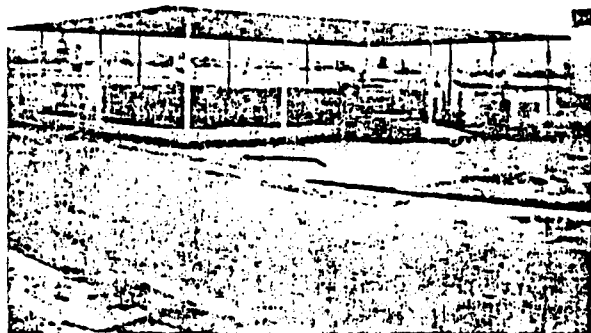
C. DATE SIGNED

7/24/81

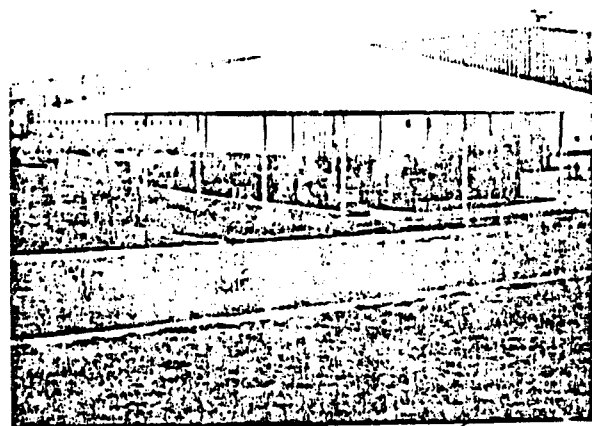


V. FACILITY DRAWING (see page 4)

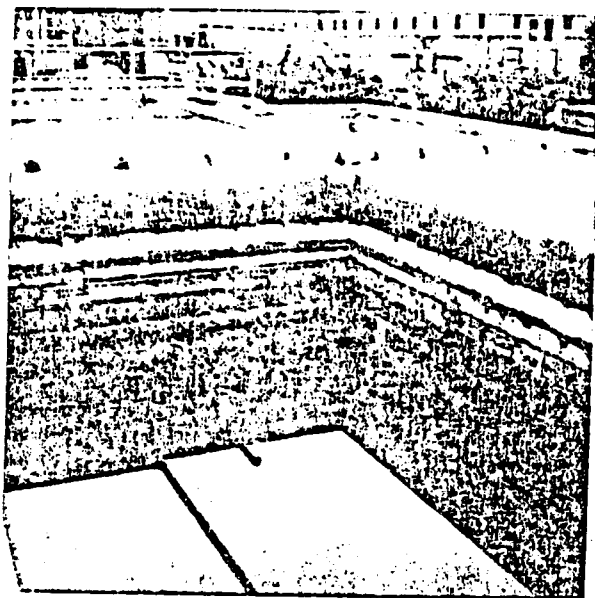
See attached.



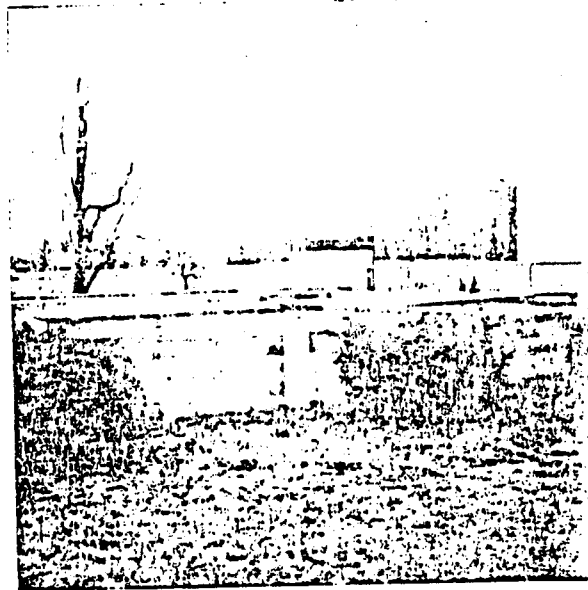
Drum Storage Area



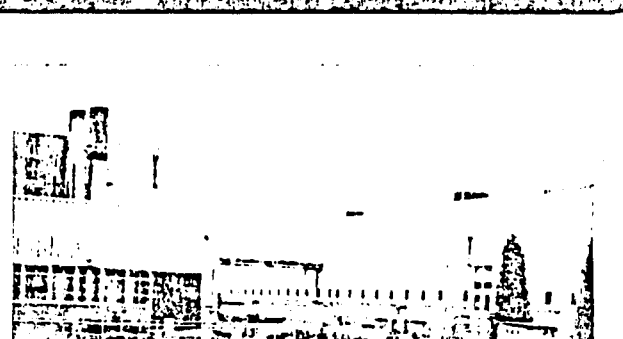
Drum Storage Area

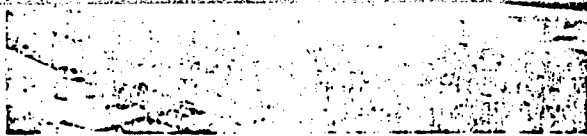


Jetting Pit

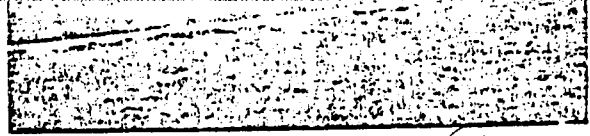


Jetting Basin

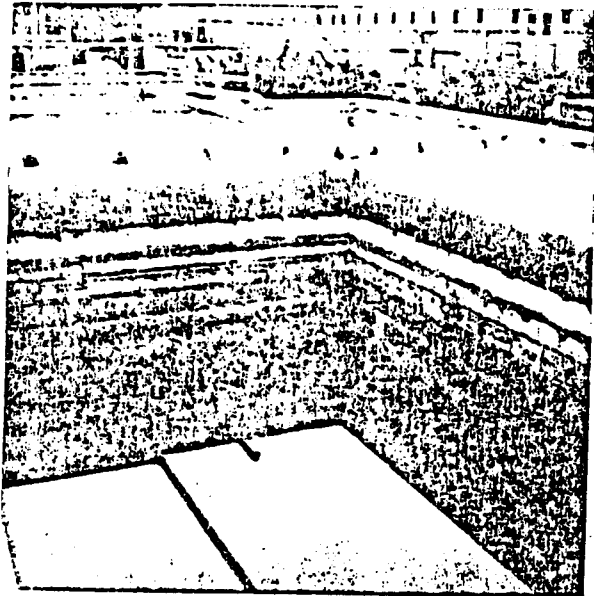




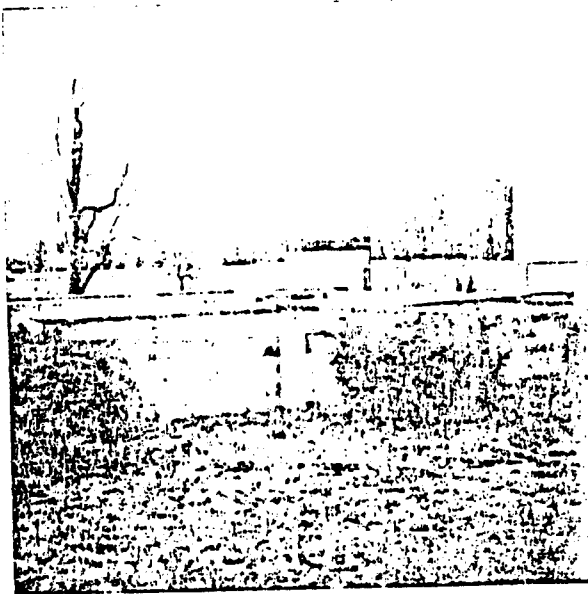
Drum Storage Area



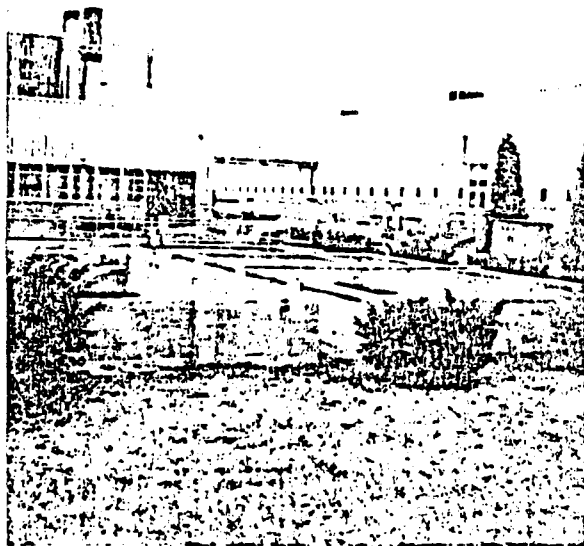
Drum Storage Area



Settling Pit



Settling Bed



Both Settling Beds

RL Sage

Photos
11-18-80
taken

7/30/81

Bohucki/Stinger *wfp!* *61D*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

400 AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JUL 29 1981

D

Mr. Finley M. Fritz
Leeds & Northrup Company - North Wales
Sumneytown Pike
North Wales, PA 19454

Dear Mr. Fritz:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin

Shirley D. Bulkin
Chief, Administrative Support Section
Permit Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date Prepared: July 23, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location, and EPA Identification Number.

Name: Leeds & Northrup Company - North Wales

Location: Sunnyside Pike
North Wales, PA 19454

EPA I.D. No.: PAD 00 227 7952

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. Finley M. Fritz, Vice President Corp. Development

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>S01</u>	<u>18,000 Gals.</u>
<u>S02</u>	<u>30,000 Gals.</u>
<u>T01</u>	<u>107 Gals/Day</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

* See Attachments.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
<div style="display: flex; justify-content: space-between;"> P A D 0 0 2 2 7 7 9 5 2 T/A C 1 </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>												

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F 0 0 1	8,500	P	S 0 1	
2	F 0 0 2				included with above
3	U 2 2 6				included with above
4	D 0 0 1				included with above
5	F 0 0 3	1,000	P	S 0 1	
6	D 0 0 1				included with above
7	U 0 0 2				included with above
8	F 0 0 5	2,000	P	S 0 1	
9	D 0 0 1				included with above
10	F 0 0 6	50,000	P	S 0 2 T 0 1	
	D 0 0 0				included with above
12	F 0 0 7				included with above
13	F 0 0 8				included with above
14	F 0 0 9	4,000	P	S 0 1	
15	F 0 1 7	50,000	P	S 0 1	- TEMP. SUSPENDED 1/16/81 F.R. www
16	U 2 2 0				included with above
17	D 0 0 1				included with above
18	U 2 1 1	3,000	P	S 0 1	
19	D 0 0 2	5	P	S 0 1	
20					
21					
22					
23					
24					
25					
26					

*classification of
 wastes removed
 (actually changed -
 inc. in sep
 category).*



APPENDIX 2

NPDES PERMIT - LEEDS & NORTHRUP COMPANY

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT

WATER QUALITY MANAGEMENT PERMIT - PART I

AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

PERMIT NO. PA 0011339

In compliance with the provisions of the Clean Water Act, 33 U.S.C. 1251 et. seq. (the "Act") and Pennsylvania's Clean Streams Law, as amended, 35 P.S. Section 691.1 et. seq.,

Leeds and Northrup Company

is authorized to discharge from a facility located at

Upper Gwynedd Township
Montgomery County

to receiving waters named

Unnamed tributary of Wissahickon Creek

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts A, B, and C hereof.

This permit shall become effective on March 21, 1980.

This permit and the authorization to discharge shall expire at midnight, 6/30/81.

The authority granted by this permit is subject to the following further qualifications:

1. If there is a conflict between the application, its supporting documents and/or amendments and the standard or special conditions, the standard or special conditions shall apply.
2. Failure to comply with the rules and regulations of the Department or with the terms or conditions of this permit shall void the authority to discharge given to the permittee by this permit.

PERMIT ISSUED

DATE 3-21-80

BY

C.T. Beechwood

TITLE C.T. Beechwood, P.E.

Regional Water Quality Manager

currently operating under this
permit, awaiting reissued permit applied for 7/81

1. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, OUTFALL 001
WHICH RECEIVES WASTE FROM: settling tank after electroplating waste treatment.

LAT 40°13'00"

LONG 75°17'30"

During the period beginning issuance and lasting through expiration,
the permittee is authorized to discharge.

Such discharges shall be limited, and monitored by the permittee, as specified below:

Effluent Characteristic	Discharge Limitations *					Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)			Measurement Frequency	Sample Type
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.	Instantaneous Max.		
Flow-m ³ /day (MGD)						1/week	measured
Total Iron	.04 (.09)	.19 (.42)			7.0 mg/l	1/week	24 hr comp.
Total Copper	.014 (.03)	.027 (.06)			1.0 mg/l	1/week	24 hr comp.
Total Nickel	.027 (.06)	.05 (.12)			2.0 mg/l	1/week	24 hr comp.
Total Zinc	.027 (.06)	.14 (.3)			5.0 mg/l	1/week	24 hr comp.
Hexavalent Chrome	.0027 (.006)	.005 (.012)			0.2 mg/l	1/week	24 hr comp.
Total Cadmium	.00027 (.0006)	.0005 (.0012)			0.02 mg/l	1/week	24 hr comp.
Dissolved Solids	13.6 (30)	68 (150)			2500 mg/l	1/week	24 hr comp.
Trichloroethylene	-- --	.0002 (.00043)			0.0095 mg/l	1/week	24 hr comp.

The pH shall not be less than 6.0 standard units, not greater than 9.0 standard units and shall be monitored 1/week by grab sample.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): Outfall 001.

*Unless otherwise indicated, these are gross discharge limitations.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, Pennsylvania 19401
215 631-2405



December 30, 1980

Leeds and Northrup Company
Sunneytown Pike
North Wales, PA 19454

Attention: Ms. Rita L. Sage
Industrial Hygienist

Re: NPDES Application PA 0011339
Upper Gwynedd Township
Montgomery County

SECURITY OFFICE

Gentlemen:

This will acknowledge receipt of your application on December 16, 1980 for approval to administratively extend your NPDES permit under the provisions of Section 92.9 of our Department's NPDES Rules and Regulations.

The material submitted is accepted for technical review and has been assigned to James Ridolfi, 631-2411, of our staff.

Recently, the Environmental Protection Agency released for use revised NPDES permit application forms. It is necessary that all applicants for renewal of expiring NPDES permits for primary industries prepare and submit the information on the revised application forms. Please make special note of the supplemental inserts for the application forms, particularly the insert entitled "Warning" which relates to Form 2C relative to appropriate data collection and reporting.

We are enclosing forms for your convenience in resubmitting your application. Please return four (4) copies of the application with the appropriate fee as listed below. The original application must be notarized.

Sewerage - \$500.00
Industrial Wastes - \$500.00

The application should be submitted to this office prior to August 1, 1981.

Very truly yours,

C. T. Beechwood, P.E.
Regional Water Quality Manager

cc: Upper Gwynedd Township
DRBC (application enclosed)
Program Services
Re - James Ridolfi
EPA (application enclosed)
30 2DC369

ENCLOSURES

(FOR CHECK PAYMENTS NOT COVERED BY SUPPLIER'S INVOICE)

FOR ACCOUNTING USE ONLY			
Coded By	Acctg. App	Month	Voucher Number

PAY TO: Pennsylvania Dept. of Environmental Resources

ADDRESS: 1875 New Hope Street, Norristown, PA 19401

DATE: 7/21/81

FOR:

Permit for Industrial Wastes

AMOUNT		ACCOUNT NUMBER
	500 00	690656
	500 00	
E.M. Stringer	J.D. Borucki	
PREPARED BY	APPROVED BY	

Check One



MAIL DIRECT TOGETHER WITH ATTACHMENTS CLIPPED TO PAYMENT VOUCHER.

11

SEND CHECK TO: _____ MAIL DROP: _____



CALL: _____ BELL: _____ WHEN CHECK IS READY.

FORM 33-11-0 (09-104) REV.2/79

Sewerage - \$500.00

Industrial Wastes - \$500.00

The application should be submitted to this office prior to August 1, 1981.

Very truly yours,

C. T. Beechwood, P.E.
Regional Water Quality Manager

cc: Upper Gwynedd Township
DRBC (application enclosed)
Program Services
Re - James Pidolfi
EPA (application enclosed)
30 2DC369

ENCLOSURES

II. POLLUTANT CHARACTERISTICS

SPECIFIC QUESTIONS		MARK 'X'			SPECIFIC QUESTIONS		MARK 'X'		
		YES	NO	FORM ATTACHED			YES	NO	FORM ATTACHED
A.	Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)				B.	Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			
		19	17	18			19	20	21
C.	Is this a facility which currently results in discharges to waters of the U.S. other than those described in or B above? (FORM 2C)				D.	Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			
		22	23	24			25	26	27
E.	Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)				F.	Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)			
		28	29	30			31	32	33
G.	Do you or will you inject at this facility any produced or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)				H.	Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)			
		34	35	36			37	38	39
I.	Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons or year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)				J.	Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			
		40	41	42			43	44	45

A Form 3510-1 (6-80)

CONTINUE ON REVERSE

Form 3811, Jan. 1973

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
☒ Show to whom and date delivered..... c
☐ Show to whom, date and address of delivery..... c
☐ RESTRICTED DELIVERY
 Show to whom and date delivered..... c
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$ ____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 MR. JOSEPH FEOLA
 DEPARTMENT OF ECONOMIC AFFAIRS
 1375 NEW HAVEN STREET
 NEW BRITAIN, PA. 19401

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	3102	

 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☒ Authorized agent

4. DATE OF DELIVERY: 3/11/73 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FORM 1		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER	
 EPA		GENERAL INSTRUCTIONS			
		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.			
		PLEASE PLACE LABEL IN THIS SPACE			
II. POLLUTANT CHARACTERISTICS					
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.					
SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS	
		YES	NO	FORM ATTACHED	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		16	17	18	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		22	23	24	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		28	29	30	
G. Do you or will you inject at this facility any produced or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		34	35	36	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		40	41	42	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		19	20	21	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		25	26	27	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		31	32	33	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		37	38	39	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		43	44	45	
III. NAME OF FACILITY					
LEEDS & NORTHRUP COMPANY					
IV. FACILITY CONTACT					
A. NAME & TITLE (last, first, & title)			B. PHONE (area code & no.)		
AGE RITA L IND HYGIENIST			215 643 2000		
V. FACILITY MAILING ADDRESS					
A. STREET OR P.O. BOX					
SUMNEYTOWN PIKE					
B. CITY OR TOWN				C. STATE	D. ZIP CODE
NORTH WALES				PA	19454
VI. FACILITY LOCATION					
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
SUMNEYTOWN PIKE					
B. COUNTY NAME			C. CITY OR TOWN		
TOMGOMERY			NORTH WALES		
D. STATE			E. ZIP CODE	F. COUNTY CODE (if known)	
PA			19454		

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST		B. SECOND	
3 8 2 3 (specify)	Industrial Instruments	7 3 8 2 4 (specify)	Totalizing Fluid
C. THIRD		D. FOURTH	
3 6 7 4 (specify)	Semi-Conductors	7 3 5 7 3 (specify)	Electronic Computing Equipment

VIII. OPERATOR INFORMATION

A. NAME		B. Is the name listed in Item VIII-A also the owner?
LEEDS & NORTHRUP COMPANY		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box: if "Other", specify.)		D. PHONE (area code & no.)
F - FEDERAL S - STATE P - PRIVATE M - PUBLIC (other than federal or state) O - OTHER (specify)		2 1 5 6 4 3 2 0 0 0 66
E. STREET OR P.O. BOX		
UMNEYTOWN PIKE		
F. CITY OR TOWN	G. STATE	H. ZIP CODE
NORTH WALES	PA	1 9 4 5 4
		IX. INDIAN LAND
		Is the facility located on Indian lands?
		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)		D. PSD (Air Emissions from Proposed Sources)	
9 N		9 P	
B. UIC (Underground Injection of Fluids)		E. OTHER (specify)	
9 U			
C. RCRA (Hazardous Wastes)		E. OTHER (specify)	

VI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

I. NATURE OF BUSINESS (provide a brief description)

Leeds & Northrup Company is a manufacturer of Energy and Process Control Instrumentation and Digital Computer Control Systems. L&N manufactures transmitters, transducers, controllers, and various types of display instrumentation.

State of Pennsylvania
County of Montgomery

Sworn to and subscribed before me
this 28th day of July 1981

Marie L. Boulton
MARIE L. BOULTON, Notary Public
North Wales Boro, Montgomery Co.
My Commission Expires August 8, 1983

I. CERTIFICATION (see instructions)

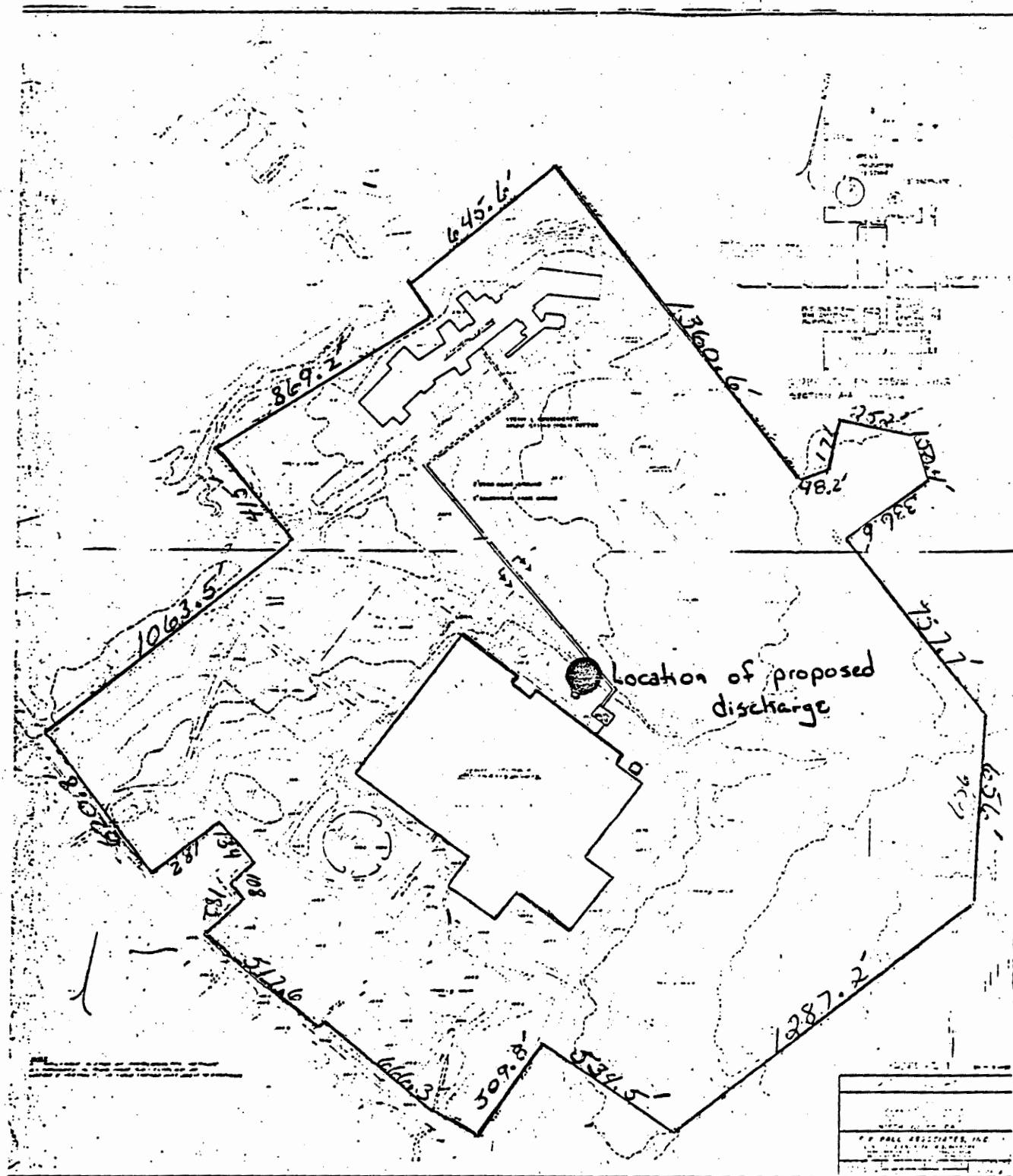
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert D. Eisenhardt President, Instruments Unit	<i>Robert D. Eisenhardt</i>	7/28/81

COMMENTS FOR OFFICIAL USE ONLY

C	
---	--

MAP Indication Legal Boundaries



Spotts, Stevens and McCoy, inc.



CONSULTING ENGINEERS

Air and Water Pollution Control · Water Supply · Municipal Engineering and Planning · Community Development

LABORATORY REPORT

Client Leeds & Northrup Company

Date July 28, 1981

Address Sunneytown Pike

P.O. Number _____

North Wales, PA 19454

W.O. Number 13011-000

ANALYSIS: Water analysis for NPDES permit

SSM No.: 81-6-47

Type: Water

<u>Test</u>	<u>Result</u>
BOD ₅	12
TOC	9.9
COD	3.8
Total Suspended Solid	16.2
Ammonia	none detected
pH	7.8*
Bromide	none detected
Chlorine Residual	<0.2
Color	1 color unit*
Fluoride	0.30
Nitrate-Nitrite	0.210
Nitrogen (total organic)	<1
Oil and Grease	<1
Phosphorus (total)	0.130
Sulfate	232.5
Sulfide	none detected
Sulfite	none detected
Surfactants	none detected
Aluminum	none detected
Barium	none detected
Boron	none detected
Cobalt	none detected
Magnesium	28.135
Molybdenum	none detected
Manganese	0.003
Tin	none detected

rm 141
81 SRW

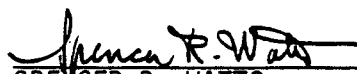
Leeds & Northrup Co.
July 28, 1981

-2-

Antimony	none detected
Arsenic	none detected
Beryllium	none detected
Lead	<0.001
Mercury	none detected
Selenium	none detected
Silver	none detected
Thallium	none detected
Cyanide	<0.002
Phenol	<0.001
<u>Organics</u>	
Volatile Compounds	none detected
Acid Compounds	none detected
Base Neutral Compounds	none detected

Analytical Method as described in 14th Ed. APHA STANDARD METHODS

Comments: *All units mg/l unless marked.


SPENCER R. WATTS
Manager - Laboratory Services

CONTINUED FROM THE FRONT

Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?
☐ YES (complete the following table) ☒ NO (go to Section III)

OUTFALL NUMBER (list)	2. OPERATION(s) CONTRIBUTING FLOW (list)	3. FREQUENCY		4. FLOW					
		a. DAYS PER WEEK (specify average)	b. MONTHS PER YEAR (specify average)	a. FLOW RATE (in mgd)		b. TOTAL VOLUME (specify with units)		c. DUR- ATION (in days)	
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY		
N/A	N/A.								

III. MAXIMUM PRODUCTION

Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☐ YES (complete Item III-B) ☒ NO (go to Section IV)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (or other measure of operation)?

☐ YES (complete Item III-C) ☒ NO (go to Section IV)

C. If you answered "Yes" to Item III-B, list the quantity which represents an actual measurement of your maximum level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. MAXIMUM QUANTITY			2. AFFECTED OUTFALLS (list outfall numbers)
a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. (specify)	
N/A	N/A	N/A	N/A

IMPROVEMENTS

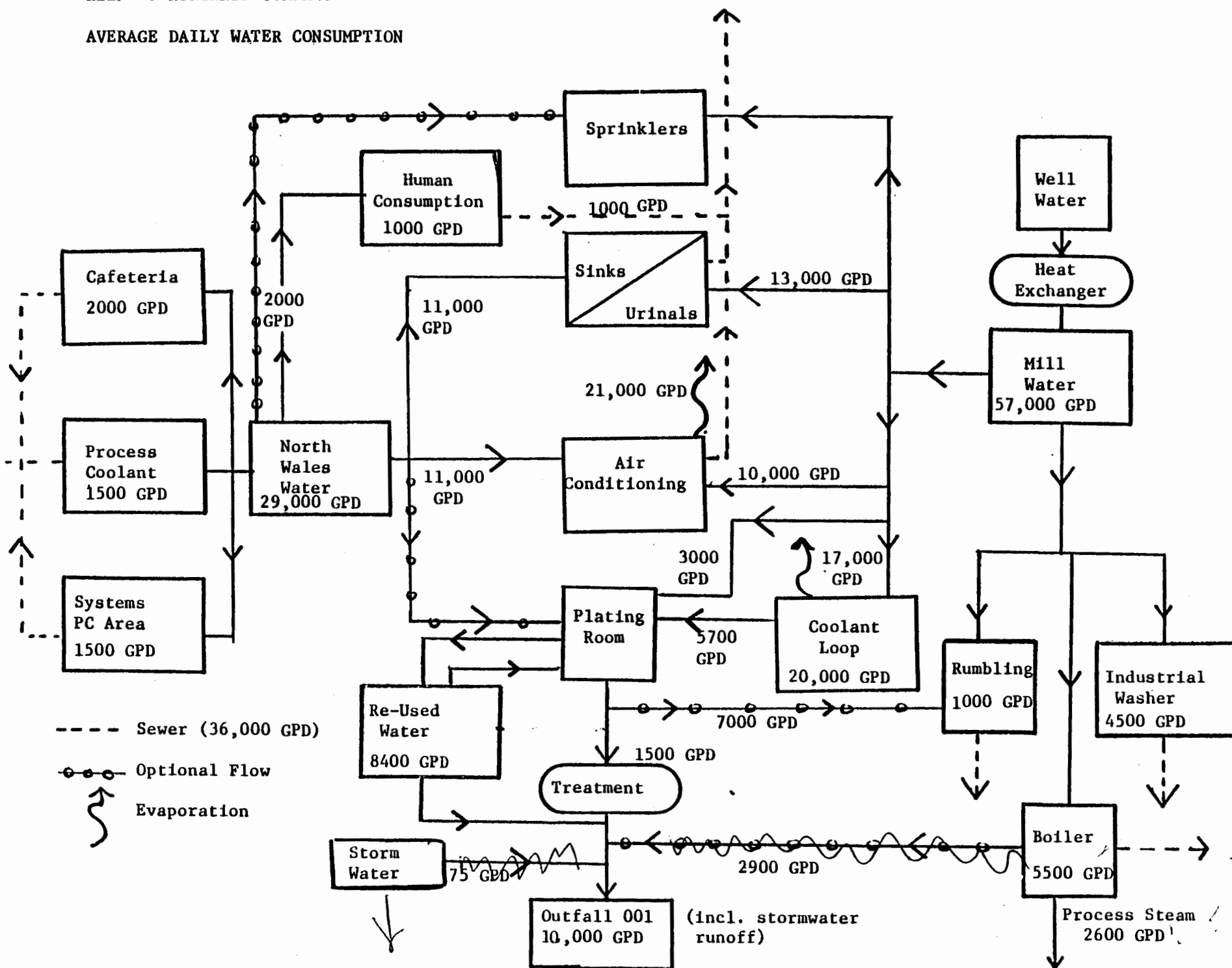
A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operation of waste-water treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES (complete the following table) ☒ NO (go to Item IV-B)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. REQUIRED	b. PROJECTED
N/A		N/A	N/A		

OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (or other environmental projects which may affect your discharges) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction. ☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

AVERAGE DAILY WATER CONSUMPTION



INTAKE AND EFFLUENT CHARACTERISTICS

B, & C: See instructions before proceeding — Complete one set of tables for each outfall — Annotate the outfall number in the space provided.
NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
N/A	N/A	N/A	N/A

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

A. Is any pollutant listed in Item V-C a substance or a component of a substance which you do or expect that you will over the next 5 years use or manufacture as an intermediate or final product or byproduct?

☒ YES (list all such pollutants below)

☐ NO (go to Item VI-B)

Copper
Nickel
Zinc

B. Are your operations such that your raw materials, processes, or products can reasonably be expected to vary so that your discharges of pollutants may during the next 5 years exceed two times the maximum values reported in Item V?

☐ YES (complete Item VI-C below)

☒ NO (go to Section VII)

C. If you answered "Yes" to Item VI-B, explain below and describe in detail the sources and expected levels of such pollutants which you anticipate will be discharged from each outfall over the next 5 years, to the best of your ability at this time. Continue on additional sheets if you need more space.

N/A

CONTINUED FROM THE FRONT

VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☐ YES (Identify the test(s) and describe their purposes below)

☒ NO (go to Section VIII)

N/A

VIII. CONTRACT ANALYSIS INFORMATION

Are any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☒ YES (List the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)

☐ NO (go to Section IX)

A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANALYZED (list)
Spotts, Stevens and McCoy, Inc.	345 N. Wyomissing Blvd. P. O. Box 6307 Wyomissing, PA 19610	(215) 376-6581	all analytical results except those noted below
Letz - Converse - Murdoch, Inc.	One Plymouth Meeting Mall Plymouth Meeting, PA 19462	(215) 825-3800	Part B (S) Part C 4, 5, 6, 9, 13 (M)
State of Pennsylvania County of Montgomery		Sworn to and subscribed before me this <u>28th</u> day of <u>July</u> , 19 <u>81</u> <i>Marie L. Boulton</i> MARIE L. BOULTON, Notary Public North Wales Boro., Montgomery Co. My Commission Expires August 8, 1983	

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)	B. PHONE NO. (area code & no.)
R. D. Eisenhardt, President, Instruments Unit	(215) 643-2000
C. SIGNATURE <i>Robert D. Eisenhardt</i>	D. DATE SIGNED 7/28/81

*None Detected (ND)

EPA I.D. NUMBER (copy from Item 1 of Form 1)

PAD 002277952

Form Approved OMB No. 158-R0173

OUTFALL NO.

001

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (use the same format) instead of completing these pages. SEE INSTRUCTIONS.

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C)

PART A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT						3. UNITS (specify if blank)		4. INTAKE (optional)			
	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Biochemical Oxygen Demand (BOD)	12	457.8					1	mg/L	g			
b. Chemical Oxygen Demand (COD)	3.8	144.9					1	mg/L	g			
c. Total Organic Carbon (TOC)	9.9	377.7					1	mg/L	g			
d. Total Suspended Solids (TSS)	16.2	618.1					1	mg/L	g			
e. Ammonia (as N)	ND	ND					1	--	-			
f. Flow	VALUE 7 GPM		VALUE 15 GPM		VALUE 7 GPM		50			VALUE		
g. Temperature (winter)	VALUE 40°		VALUE		VALUE			°C		VALUE		
h. Temperature (summer)	VALUE 65°		VALUE		VALUE			°C		VALUE		
i. pH	MINIMUM 7.8	MAXIMUM 8.2	MINIMUM	MAXIMUM	<div></div>			STANDARD UNITS		<div></div>		

PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2-a for any pollutant, you must provide the results of at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. (if available)	2. MARK 'X'		3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVG. VALUE (if available)		d. NO. OF ANALYSES	e. CONCENTRATION	f. MASS	g. LONG TERM AVERAGE VALUE		h. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Bromide (24959-67-9)		X	ND	ND					1	--	--			
b. Chlorine, Total Residual	X		<0.2	7.6					1	mg/L	g			
c. Color	X		1						1	color unit				
d. Fecal Coliform		X	--	--					--	--	--			
e. Fluoride (14663-49-8)	X		.30	7.6					1	mg/L	g			
f. Nitrate— nitrite (as N)	X		.210	7.6					1	mg/L	g			

1. POLLUTANT AND CAS NO. (If available)	2. ANALYSIS		3. EFFLUENT						4. UNITS		5. INTAKE (op)		6. NO. OF ANALYSES	
	a. ANALYSIS PERCENT	b. ANALYSIS PERCENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (If available)		c. LONG TERM AVERAGE VALUE (If available)		a. CONCENTRATION	b. MASS	a. DAILY VALUE			
			(i) CONCENTRATION	(j) MASS	(i) CONCENTRATION	(j) MASS	(i) CONCENTRATION	(j) MASS			(i) CONCENTRATION	(j) MASS		
g. Nitrogen, Total Organic (as N)	X		< 1	38.1					1	mg/L	g			
h. Oil and Grease	X		< 1	38.1					1	mg/L	g			
i. Phosphorus (as P), Total (7723-14-0)	X		0.130	4.9					1	mg/L	g			
j. Radioactivity														
(1) Alpha, Total		X												
(2) Beta, Total		X												
(3) Radium, Total		X												
(4) Radium 226, Total		X												
k. Sulfate (as SO ₄) (14808-79-8)	X		232.5	8.8					1	mg/L	Kg			
l. Sulfide (as S)		X	ND	ND					1	--	--			
m. Sulfite (as SO ₃) (14266-45-3)		X	ND	ND					1	--	--			
n. Surfactants		X	ND	ND					1	--	--			
o. Aluminum, Total (7429-90-5)		X	ND	ND					1	--	--			
p. Barium, Total (7440-39-3)		X	ND	ND					1	--	--			
q. Boron, Total (7440-42-8)		X	ND	ND					1	--	--			
r. Cobalt, Total (7440-48-4)		X	ND	ND					1	--	--			
s. Iron, Total (7439-89-6)	X		0.80	0.048					50	mg/L	lb			
t. Magnesium, Total (7439-95-4)	X		28.135	1.1					1	mg/L	Kg			
u. Molybdenum, Total (7439-98-7)		X	ND	ND					1	--	--			
v. Manganese, Total (7439-96-6)	X		0.003	0.1					1	mg/L	g			
w. Tin, Total (7440-31-5)		X	ND	ND					1	--	--			
x. Titanium, Total (7440-32-6)		X												

PAD 002277952

001

Form Approved OMB No. 158-R0173

CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (*secondary industries, non-process wastewater outfalls, and non-required GC/MS fractions*), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe to be absent. If you mark either columns 2-a or 2-b for any pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part; please review each carefully. Complete one table (*all seven pages*) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	A. TESTING REQUIRED (if available)	B. BELIEVED PRESENT	C. BELIEVED ABSENT	B. MAXIMUM DAILY VALUE		D. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVG. VALUE (if available)		D. NO. OF ANALYSES	B. CONCENTRATION	b. MASS	B. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)	X			ND	ND					1					
2M. Arsenic, Total (7440-38-2)	X			ND	ND					1					
3M. Beryllium, Total, 7440-41-7)	X			ND	ND					1					
4M. Cadmium, Total (7440-43-9)	X			0.012	0.0007					50	ppm	1b			
5M. Chromium, Total (7440-47-3)	X			<0.02	.7					1	ppm	g			
6M. Copper, Total (7550-50-8)	X			.1	0.006					50	ppm	1b			
7M. Lead, Total (7439-97-6)	X			<0.001	0.038					1	mg/L	g			
8M. Mercury, Total (7439-97-6)	X			ND	ND					1					
9M. Nickel, Total (7440-02-0)	X			.48	0.028					50	ppm	1b			
10M. Selenium, Total (7782-49-2)	X			ND	ND					1					
11M. Silver, Total (7440-22-4)	X			ND	ND					1					
12M. Thallium, Total (7440-28-0)	X			ND	ND					1					
13M. Zinc, Total (7440-66-6)	X			0.25	0.015					50	ppm	1b			
14M. Cyanide, Total (57-12-6)	X			<0.002	0.076					1	mg/L	g			
15M. Phenols, Total	X			<0.001	0.038					1	mg/L	g			

DIOXIN

2,3,7,8-Tetrachlorodibenzo-P-Dioxin (1764-01-6)	X	DESCRIBE RESULTS No Precursors Present
---	---	---

CONTINUED FROM

FRL...

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						11. NO. OF ANAL- YSES	4. UNITS		5. INTAKE (p. anal)		
	A. TOXIC SUB- STANCE LU	B. RE- ACTIVE SUB- STANCE	C. RE- ACTIVE AR- SENIC	8. MAXIMUM DAILY VALUE		9. MAXIMUM 30 DAY VALUE (if available)		10. LONG TERM AVG. VALUE (if available)			8. CONCENTRATION	9. MASS	12. LONG TERM AVG. VALUE		11. NO. OF ANAL- YSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS															
1V. Acrolein (107-02-8)	X			ND	ND					1					
2V. Acrylonitrile (107-13-1)	X			ND	ND					1					
3V. Benzene (71-43-2)	X			ND	ND					1					
4V. Bis (Chloro- methyl) Ether (542-88-1)	X			ND	ND					1					
5V. Bromoform (75-25-2)	X			ND	ND					1					
6V. Carbon Tetrachloride (56-23-5)	X			ND	ND					1					
7V. Chlorobenzene (108-90-7)	X			ND	ND					1					
8V. Chlorodi- bromomethane (124-48-1)	X			ND	ND					1					
9V. Chloroethane (75-00-3)	X			ND	ND					1					
10V. 2-Chloro- ethylvinyl Ether (110-75-8)	X			ND	ND					1					
11V. Chloroform (67-66-3)	X			ND	ND					1					
12V. Dichloro- bromomethane (75-27-4)	X			ND	ND					1					
13V. Dichloro- difluoromethane (75-71-8)	X			ND	ND					1					
14V. 1,1-Dichloro- ethane (75-34-3)	X			ND	ND					1					
15V. 1,2-Dichloro- ethane (107-06-2)	X			ND	ND					1					
16V. 1,1-Dichloro- ethylene (75-35-4)	X			ND	ND					1					
17V. 1,2-Dichloro- propane (78-87-5)	X			ND	ND					1					
18V. 1,2-Dichloro- propylene (542-75-6)	X			ND	ND					1					
19V. Ethylbenzene (100-41-4)	X			ND	ND					1					
20V. Methyl Bromide (74-83-9)	X			ND	ND					1					
21V. Methyl Chloride (74-87-3)	X			ND	ND					1					

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)	
	A. TEST METHOD	B. NO. OF ANALYSES	C. REF. METHOD	D. MAXIMUM DAILY VALUE		E. LONG TERM AVERAGE VALUE		F. NO. OF ANALYSES	G. CONCENTRATION	H. MASS	I. LONG TERM AVERAGE VALUE		J. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - VOLATILE COMPOUNDS (continued)													
22V. Methylene Chloride (75-09-2)	X			ND	ND					1			
23V. 1,1,2,2-Tetrachloroethane (79-34-5)	X			ND	ND					1			
24V. Tetrachloroethylene (127-18-4)	X			ND	ND					1			
25V. Toluene (108-88-3)	X			ND	ND					1			
26V. 1,2-Trans-Dichloroethylene (156-60-5)	X			ND	ND					1			
27V. 1,1,1-Trichloroethane (71-55-6)	X			ND	ND					1			
28V. 1,1,2-Trichloroethane (79-00-5)	X			ND	ND					1			
29V. Trichloroethylene (79-01-6)	X			0.005	.0003					48	ppm	lb	
30V. Trichlorofluoromethane (75-69-4)	X			ND	ND					1			
31V. Vinyl Chloride (75-01-4)	X			ND	ND					1			
GC/MS FRACTION - ACID COMPOUNDS													
1A. 2-Chlorophenol (95-67-8)	X			ND	ND					1			
2A. 2,4-Dichlorophenol (120-83-2)	X			ND	ND					1			
3A. 2,4-Dinitrophenol (106-67-9)	X			ND	ND					1			
4A. 4,6-Dinitro-O-Cresol (534-52-1)	X			ND	ND					1			
5A. 2,4-Dinitrophenol (51-28-5)	X			ND	ND					1			
6A. 2-Nitrophenol (88-75-5)	X			ND	ND					1			
7A. 4-Nitrophenol (100-02-7)	X			ND	ND					1			
8A. P-Chloro-M-Cresol (59-50-7)	X			ND	ND					1			
9A. Pentachlorophenol (87-86-5)	X			ND	ND					1			
10A. Phenol (108-95-2)	X			ND	ND					1			
11A. 2,4,6-Trichlorophenol (88-06-2)	X			ND	ND					1			

1. POLLUTANT AND CAS NUMBER (if available)	2. MATRIX 'X'			3. EFFLUENT						4. UNITS		5. INITIAL			6. NO. OF ANAL- YSES
	a. TEST METHOD	b. DE- LIVERED PRE- SENT	c. DE- LIVERED AD- SENT	d. MAXIMUM DAILY VALUE		e. 30 DAY VALUE (if available)		f. LONG TERM AVG. VAL (if available)		a. CONCENTRATION	b. MASS	g. LONG TERM AVERAGE VALUE		h. NO. OF ANAL- YSES	
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			(1) CONCENTRATION	(2) MASS		
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)	X			ND	ND					1					
2B. Acenaphthylene (208-96-8)	X			ND	ND					1					
3B. Anthracene (120-12-7)	X			ND	ND					1					
4B. Benzidine (92-87-5)	X			ND	ND					1					
5B. Benzo (a) Anthracene (56-55-3)	X			ND	ND					1					
6B. Benzo (a) Pyrene (50-32-8)	X			ND	ND					1					
7B. 3,4-Benzo-fluoranthene (205-99-2)	X			ND	ND					1					
8B. Benzo (ghi) Perylene (191-24-2)	X			ND	ND					1					
9B. Benzo (h) Fluoranthene (207-08-9)	X			ND	ND					1					
10B. Bis (2-Chloro-ethoxy) Methane (111-91-1)	X			ND	ND					1					
11B. Bis (2-Chloro-ethyl) Ether (111-44-4)	X			ND	ND					1					
12B. Bis (2-Chloro-isopropyl) Ether (39638-32-9)	X			ND	ND					1					
13B. Bis (2-Ethyl-hexyl) Phthalate (117-81-7)	X			ND	ND					1					
14B. 4-Bromo-phenyl Phenyl Ether (101-55-3)	X			ND	ND					1					
15B. Butyl Benzyl Phthalate (85-68-7)	X			ND	ND					1					
16B. 2-Chloro-naphthalene (91-58-7)	X			ND	ND					1					
17B. 4-Chloro-phenyl Phenyl Ether (7005-72-3)	X			ND	ND					1					
18B. Chrysene (218-01-9)	X			ND	ND					1					
19B. Dibenzo (a,h) Anthracene (53-70-3)	X			ND	ND					1					
20B. 1,2-Dichloro-benzene (95-50-1)	X			ND	ND					1					
21B. 1,3-Dichloro-benzene (541-73-1)	X			ND	ND					1					

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	A. TYPE OF ANALYSIS (1) CONCENTRATION (2) MASS	B. DATE OF ANALYSIS	C. DATE OF RECEIPT	8. MAXIMUM DAILY VALUE		9. MAXIMUM 30 DAY VALUE (if available)		10. LONG TERM AVG. VALUE (if available)		11. NO. OF ANALYSES	8. CONCENTRATION	12. MASS	9. LONG TERM AVERAGE VALUE		13. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)															
22B. 1,4-Dichlorobenzene (106-46-7)	X			ND	ND					1					
23B. 3,3'-Dichlorobenzidine (91-94-1)	X			ND	ND					1					
24B. Diethyl Phthalate (84-66-2)	X			ND	ND					1					
25B. Dimethyl Phthalate (131-11-3)	X			ND	ND					1					
26B. Di-N-Butyl Phthalate (84-74-2)	X			ND	ND					1					
27B. 2,4-Dinitrotoluene (121-14-2)	X			ND	ND					1					
28B. 2,6-Dinitrotoluene (606-20-2)	X			ND	ND					1					
29B. Di-N-Octyl Phthalate (117-84-0)	X			ND	ND					1					
30B. 1,2-Diphenylhydrazine (as Azobenzene) (122-66-7)	X			ND	ND					1					
31B. Fluoranthene (206-44-0)	X			ND	ND					1					
32B. Fluorene (86-73-7)	X			ND	ND					1					
33B. Hexachlorobenzene (118-71-1)	X			ND	ND					1					
34B. Hexachlorobutadiene (87-68-3)	X			ND	ND					1					
35B. Hexachlorocyclopentadiene (77-47-4)	X			ND	ND					1					
36B. Hexachloroethane (67-72-1)	X			ND	ND					1					
37B. Indeno (1,2,3-cd) Pyrene (193-39-6)	X			ND	ND					1					
38B. Isophorone (78-59-1)	X			ND	ND					1					
39B. Naphthalene (91-20-3)	X			ND	ND					1					
40B. Nitrobenzene (98-95-3)	X			ND	ND					1					
41B. N-Nitrosodimethylamine (62-75-9)	X			ND	ND					1					
42B. N-Nitrosodi-N-Propylamine (621-64-7)	X			ND	ND					1					

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT				4. UNITS		5. INFO (optional)					
	A. LISTED POLLUTANT CAS NO.	B. DE- LISTED POLLUTANT CAS NO.	C. DE- LISTED POLLUTANT CAS NO.	B. MAXIMUM DAILY VALUE		C. MAXIMUM 1 DAY VALUE (if available)		D. LONG TERM AVG. VALUE (if available)		E. NO. OF ANAL- YSES	F. CONCENTRATION	G. MASS	H. LONG TERM AVERAGE VALUE		I. NO. OF ANAL- YSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)															
43B. N-Nitrosodiphenylamine (86-30-6)	X			ND	ND					1					
44B. Phenanthrene (85-01-8)	X			ND	ND					1					
45B. Pyrene (129-00-0)	X			ND	ND					1					
46B. 1,2,4 - Tri-chlorobenzene (120-82-1)	X			ND	ND					1					
GC/MS FRACTION - PESTICIDES NA															
1P. Aldrin (309-00-2)			X												
2P. α -BHC (319-84-6)			X												
3P. β -BHC (319-85-7)			X												
4P. γ -BHC (58-89-9)			X												
5P. δ -BHC (319-86-8)			X												
6P. Chlordane (57-74-9)			X												
7P. 4,4'-DDT (50-29-3)			X												
8P. 4,4'-DDE (72-55-9)			X												
9P. 4,4'-DDD (72-54-8)			X												
10P. Dieldrin (60-57-1)			X												
11P. α -Endosulfan (115-29-7)			X												
12P. β -Endosulfan (115-29-7)			X												
13P. Endosulfan Sulfate (1031-07-8)			X												
14P. Endrin (72-20-8)			X												
15P. Endrin Aldehyde (7421-93-4)			X												
16P. Heptachlor (76-44-8)			X												

CONTINUED FROM PAGE V-8

EPA I.D. NO. 2R (copy from Item 1 of Form 1) OUTFALL NUMBER
 PAD 002277952 001

Form Approved OMB No. 158-R0173

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	A. TEST METH. OR GUIDE NO.	B. RE- CEIVED PMT. SANT	C. RE- CEIVED AD- SANT	D. MAXIMUM DAILY VALUE		D. MAXIMUM 30 DAY VALUE (if available)		E. LONG TERM AVG. VALUE (if available)		F. NO. OF ANAL- YSES	G. CONCENTRATION	H. MASS	I. LONG TERM AVERAGE VALUE		J. NO. OF ANAL- YSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - PESTICIDES (continued)															
17P. Heptachlor Epoxide (1024-57-3)			X												
18P. PCB-1242 (53469-21-9)			X												
19P. PCB-1254 (11097-69-1)			X												
20P. PCB-1221 (11104-28-2)			X												
21P. PCB-1232 (11141-16-5)			X												
22P. PCB-1248 (12672-29-6)			X												
23P. PCB-1260 (11096-82-5)			X												
24P. PCB-1016 (12674-11-2)			X												
25P. Toxaphene (8001-35-2)			X												

EPA Form 3510-2C(6-80)

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BCM

APPENDIX 3

PART B NOTIFICATION - PADER



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2420



March 2, 1983

Ms. Rita Saga, Industrial Hygienist
Leeds and Northrup Company
Summeytown Pike
North Wales, PA 19454

RECEIVED

MAR 07 1983

R. S. SCHREINER

Re: EPA Identification No. PAD 002277952
Facility Name: Leeds and Northrup Company
Summeytown Pike
North Wales, PA 19454

Dear Ms. Saga:

This letter constitutes a formal request for Part B of your application for Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 PA Code Chapter 75, Subchapter D, for the facility referred above. This request is made under the authority of Section 75.265(z)(6) of the regulations. You should refer to the hazardous waste management regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you for the requirements of the Part B application. Your Part B application must be submitted no later than September 1, 1983. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

If your facility is not a TSD (treatment, storage or disposal site), or if you stopped functioning as a TSD facility after November 19, 1980, or if you qualify under the Permit by Rule provision of the regulations, it will be necessary for you to contact one of our field offices, and to arrange for an inspection to confirm this. Our field offices and the areas covered are the Bethlehem Office, phone number 861-2070, covering Berks, Lehigh and Northampton Counties; and the Norristown Office, phone number 631-2420, covering Philadelphia, Bucks, Chester, Delaware and Montgomery Counties.

If you functioned as a TSD after November 19, 1980, it will be necessary for you to submit four copies of a closure plan to Mr. Bruce Beitler of this office.

Enclosed are reference checklists for your Part B application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Your Part B application will be reviewed for a hazardous waste management TSD Permit by both the U. S. Environmental Protection Agency and the Department of Environmental Resources until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

You should submit the Part B application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

When completed, please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact Mr. Lawrence H. Lunsik, Solid Waste Facilities Supervisor, at the letterhead address, or by calling 215 631-2420.

Very truly yours,,

Wayne L. Lynn

WAYNE L. LYNN
Regional Solid Waste Manager

Re P770

ENCLOSURE

BCM

APPENDIX 4

NOTICE TO CLOSE THE SLUDGE DEWATERING BEDS - LETTER
LEEDS & NORTHRUP COMPANY TO PADER



LEEDS & NORTHRUP COMPANY Sumneytown Pike • North Wales, PA 19454
A UNIT OF GENERAL SIGNAL

February 7, 1984

Mr. Wayne L. Lynn
Regional Solid Waste Manager
Department of Environmental Resources
1875 New Hope Street
Norristown, PA 19401

Subject: EPA I.D. No. PAD002277952
Leeds and Northrup Company
Sumneytown Pike
North Wales, PA 19454

Dear Mr. Lynn:

Leeds & Northrup Company (L&N), referenced above, received a Part B notification from your office, dated March 2, 1983. On September 1, 1983, L&N submitted to your office (DER) the required Part B permit application.

However, as noted in the Part B application, L&N was revising their hazardous waste treatment system, presently used to treat wastes and rinse waters from metal finishing operations, and intending to close the treatment facility in accordance with applicable regulations.

As a result of the above information, DER returned the Part B permit application to L&N.

Thus, the intent of this letter is to formally notify your office that L&N will be filing a closure plan for the waste treatment facility (sludge dewatering beds). It is anticipated that the closure plan will be submitted to your office on or before March 21, 1984.

Should you have any questions, please contact me.

Very truly yours,

T. G. Cherrington
T. G. Cherrington
Security Supervisor

TGC:br ✓

cc: R. E. Valiga, BCM ✓

BCM

APPENDIX 5

SOIL SAMPLING PROGRAM AND RESULTS - LETTER
BCM TO LEEDS & NORTHRUP COMPANY



BCM Eastern Inc.

Engineers, Planners and Scientists

One Plymouth Meeting • Plymouth Meeting, PA 19462 • Phone: (215) 825-3800

September 21, 1983

Mr. Ted Cherrington
Leeds & Northrup
Sumneytown Pike
North Wales, PA 19454

Subject: Sludge Basin Area Soils Evaluation
BCM Project No. 5293-02

Dear Ted:

At the request of Leeds & Northrup, BCM Eastern Inc. (BCM) obtained soil samples prepared a composite sample and analyzed that composite for various inorganic and organic constituents in order to complete a preliminary assessment of the soil conditions immediately adjacent to Leeds & Northrup's three sludge settling basins. The sampling procedure, analytical results, and conclusions are presented in the following sections.

Sampling Procedures

Soil samples were taken on August 19, 1983 in the vicinity of three concrete, porous wall, sludge settling basins at Leeds and Northrup's North Wales facility. These basins consist of poured concrete slabs, approximately 3 feet below grade, upon which concrete block walls extend to approximately 3 feet above grade. Dimensions of the basins and sampling locations are shown on the attached diagram.

Hand augers were used to make four soil borings, from which samples were taken at 1 foot intervals. These borings, numbered 1 through 4 reached maximum depths of 4 feet, 5 feet, 6 feet and 4 feet, respectively. All four borings penetrated a relatively homogeneous, reddish-brown, sandy silt which contained varying sized fragments of reddish-brown shale. A black, carbon-like material was found at various depths in borings 2, 3 and 4.

The borings were located as close as possible to the basins, but were limited by the presence of a gravel filled french drain which surrounds the basins. Boring 1 is located approximately downgradient from this drain.

The hand auger was cleaned with soap and water, methanol, and distilled water prior to taking each sample. All samples were placed in jars with teflon cap liners. Composite samples were made using samples from equal depth in all four borings. The composite prepared from sample obtained from a depth of 4 feet was submitted to BCM's Norristown laboratory for analysis.

Analytical Results

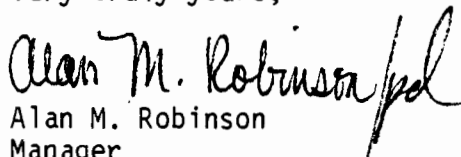
Table 1 presents the analytical results and comparison criteria where appropriate. Analysis of the sample for purgeable halocarbons (27 volatile organic compounds including trichloroethylene (TCE)) and purgeable aromatics (seven volatile organic compounds) do not reveal detectable concentrations of any of these compounds. Analyses of the total concentrations of the eight drinking water heavy metals commonly used to differentiate between hazardous and nonhazardous materials indicated concentrations well below the levels considered to be hazardous (see Table 1). As the classification is based on the analysis of the leachate from the solid sample, it can be assumed that the concentrations of the metals in a leachate made from the Leeds & Northrup sample would be substantially less. Analyses of four additional metals thought to possibly be present in the waste -- copper, iron, nickel, zinc -- revealed very low concentrations for all metals except iron. Please note, however, that high concentrations of iron would not result in the classification of a waste or soil as hazardous. It is not possible to assess whether the concentrations of metals detected are equivalent to or above the background concentrations to be expected in the soil as a background sample was not collected for analysis.

Conclusions

Based on the analytical results obtained from a composited soil sample believed to be representative of soil conditions in the vicinity of Leeds & Northrup's three sludge settling basins, the operation of those basins appears to have had no significant impact on the constituents of the adjacent soil. Although it is not possible to know whether the samples collected are truly representative, the sampling and analytical program completed was sufficient for a preliminary analysis.

We hope the information obtained will help allow you to complete the necessary determinations regarding the fate of the settling basins. Should you wish to discuss the results or the scope of an expanded program, please do not hesitate to contact me. I would be happy to meet with you and other members of Leeds & Northrup's staff.

Very truly yours,


Alan M. Robinson
Manager

Land & Water Resources Group

pd

cc: R. E. Sacks
R. J. Grzywinski
J. M. Durrant



TABLE 1
LEEDS AND NORTHRUP
NORTH WALES, PENNSYLVANIA
ANALYTICAL RESULTS - VOLATILE ORGANICS
SOIL SAMPLED ON 8/19/83

Parameter	Units	Concentration
<u>PURGABLE HALOCARBONS</u>		
Chloromethane	mg/kg	<0.1
Bromomethane	mg/kg	<0.1
Vinyl Chloride	mg/kg	<0.1
Chloroethane	mg/kg	<0.1
Methylene Chloride	mg/kg	<0.1
Trichlorofluoromethane	mg/kg	<0.1
1,1-Dichloroethene	mg/kg	<0.1
1,1-Dichloroethane	mg/kg	<0.1
Trans-1,2-Dichloroethene	mg/kg	<0.1
Chloroform	mg/kg	<0.1
1,2-Dichloroethane	mg/kg	<0.1
1,1,1-Trichloroethane	mg/kg	<0.1
Carbon Tetrachloride	mg/kg	<0.1
Bromodichloroemethane	mg/kg	<0.1
1,2-Dichloropropene	mg/kg	<0.1
Trans-1,3-Dichloropropene	mg/kg	<0.1
Trichloroethene	mg/kg	<0.1
Dibromochloromethane	mg/kg	<0.1
1,1,2-Trichloroethane	mg/kg	<0.1
Cis-1,3-Dichloropropene	mg/kg	<0.1
Bromoform	mg/kg	<0.1
1,1,2,2-Tetrachloroethane	mg/kg	<0.1
Tetrachloroethene	mg/kg	<0.1
Chlorobenzene	mg/kg	<0.1
1,3-Dichloroebenzene	mg/kg	<0.1
1,2-Dichloroebenzene	mg/kg	<0.1
1,4-Dichloroebenzene	mg/kg	<0.1
<u>PURGABLE AROMATICS</u>		
Benzene	mg/kg	<0.01
Toluene	mg/kg	<0.01
Chlorobenzene	mg/kg	<0.01
Ethyl Benzene	mg/kg	<0.01
1,3-Dichlorobenzene	mg/kg	<0.01
1,4-Dichlorobenzene	mg/kg	<0.01
1,2-Dichlorobenzene	mg/kg	<0.01



TABLE 2

LEEDS AND NORTHRUP
NORTH WALES, PENNSYLVANIA
ANALYTICAL RESULTS - METALS
SOIL SAMPLED ON 8/19/83

Parameter	Units	* Concentration	RCRA Hazardous Waste Leachate Classification Criteria (mg/l)
Silver	mg/l	<0.02	5.0
Arsenic	mg/l	0.129	5.0
Barium	mg/l	<0.40	100.0
Cadmium	mg/l	<0.01	1.0
Chromium	mg/l	0.73	5.0
Copper	mg/l	0.28	
Iron	mg/l	225	
Lead	mg/l	0.38	5.0
Mercury	mg/l	0.0003	0.2
Nickel	mg/l	0.14	
Selenium	mg/l	<0.001	1.0
Zinc	mg/l	0.55	

* Concentration is for analysis of leachate prepared from a solid sample. Analyses were by direct analysis of the solid. If analyses had been made of a leachate resulting concentration would be expected to be substantially lower.